GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Summary Page

Name of Facility SNF-Riceboro

NPDES Permit No. GA0046582

This permit is a reissuance of an existing NPDES permit for SNF-Riceboro. The facility is an organic polymer production facility and discharges a maximum of 0.435 MGD of miscellaneous utility water, thermal oxidizer scrubber blowdown, and storm water runoff. This facility discharges to Riceboro Creek in the Ogeechee River Basin. The permit expired on August 31, 2020 and became administratively extended.

The permit was placed on public notice from October 29, 2021 to November 29. 2021.

Please Note The Following Changes to the Proposed NPDES Permit From The Existing Permit

Outfall 002A (Previously Part I.A.1.)

- ☐ Removed internal limits for outfall 002A as the ELGs for 40 CFR 414 are no longer applicable.

Part I.A.1 – Effluent Limitations and Monitoring Requirements (Sum of Outfall 002 and 003)

- ☐ Added $CBOD_5$ limit of 220.3 lbs/day daily average and 330.5 lbs/day daily maximum for outfall 002 and outfall 003 combined during the months of November-April based on wasteload allocation.
- ☐ Added $CBOD_5$ limit of 49.0 lbs/day daily average and 73.5 lbs/day daily maximum for outfall 002 and outfall 003 combined during the months of May-October based on wasteload allocation.
- ☐ Added ammonia limit of 17.2 lbs/day daily average and 25.8 lbs/day daily maximum for outfall 002 and outfall 003 combined during the months of November-April based on wasteload allocation.
- ☐ Added ammonia limit of 1.1 lbs/day daily average and 1.7 lbs/day daily maximum for outfall 002 and outfall 003 combined during the months of May-October based on wasteload allocation.
- ☐ Added total phosphorus limit of 13.3 lbs/day daily average and 20.0 lbs/day daily maximum for outfall 002 and outfall 003 combined during the months of November-April based on wasteload allocation.
- ☐ Added total phosphorus limit of 4.4 lbs/day daily average and 6.6 lbs/day daily maximum for outfall 002 and outfall 003 combined during the months of May-October based on wasteload allocation.

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DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Summary Page

Part I.A.2. – Effluent Limitations and Monitoring Requirements (Outfall 002)

- ☐ Added dissolved oxygen limit of 3.5 mg/L daily minimum based on wasteload allocation.
- ☐ Removed monitoring for specific conductance because Georgia does not have a water quality standards for conductivity.
- ☐ Added total Kjeldahl nitrogen, organic nitrogen, and nitrate/nitrite monitoring per "*Georgia's Plan for the Adoption of Water Quality Standards for Nutrients*" (2013).
- ☐ Added ortho-phosphorus monitoring based on the *Strategy for Addressing Phosphorus in NPDES Permitting* (2011).
- ☐ Added total residual chlorine limit of 0.5 mg/L daily maximum based on the *Georgia Total Residual Chlorine (TRC) Strategy* (2010).

Part I.A.3. – Effluent Limitations and Monitoring Requirements (Outfall 003)

- ☐ Added dissolved oxygen limit of 3.5 mg/L daily minimum based on wasteload allocation.
- ☐ Removed monitoring for specific conductance because Georgia does not have a water quality standards for conductivity.
- ☐ Added total Kjeldahl nitrogen, organic nitrogen, and nitrate/nitrite monitoring per "*Georgia's Plan for the Adoption of Water Quality Standards for Nutrients*" (2013).
- ☐ Added ortho-phosphorus monitoring based on the *Strategy for Addressing Phosphorus in NPDES Permitting* (2011).

Standard Conditions & Boilerplate Modifications

The permit boilerplate includes modified language or added language consistent with other NPDES permits.

Final Permit Determinations and Public Comments

- ☐ Final issued permit did not change from the draft permit placed on public notice.
- ☒ Public comments were received during public notice period.
- ☐ Public hearing was held.
- ☒ Final permit includes changes from the draft permit placed on public notice. See attached permit revisions and/or permit fact sheet revisions document(s)

Public Comments and EPD Responses on Draft NPDES Permit
SNF Holding Company – Permit No. GA0046582

COMMENT RECEIVED	EPD RESPONSE
SNF disagrees with Georgia Environmental Protection Division's (GEPD) position that there is a reasonable potential for the SNF discharge to cause or contribute to a violation of the instream water quality standard and criteria for temperature. GEPD cites permit application data in its basis for the permit's thermal limits. However, those data are below 90-degrees or representative of an internal outfall only. Given the limited volume and nature of the SNF discharge, GEPD's position on thermal limits is unsupported and unreasonable – particularly when considered in connection with other permitting decisions GEPD has made with respect to these receiving waters.	The current NPDES permit, issued on September 15, 2015 includes numeric effluent and instream limitations for temperature Effluent limitations have been retained in this proposed permit in accordance with the antibacksliding requirements of the Clean Water Act Section 402(o) which states a permit may not be renewed, reissued, or modified to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit. As stated in Section 3.1 of the fact sheet, the designated use of the receiving water body is fishing and the water quality standard for temperature is, "not to exceed 90°F. At no time is the temperature of the receiving waters to be increased more than 5°F above intake temperature except that in estuarine waters the increase will not be more than 1.5°F" Though the discharges were reported to be below 90°F, the daily maximum values provided in the application for the external outfalls were both over 89.9°F, and an internal outfall which is estimated to make up 88% of the flow to outfall 002 was reported to have a daily maximum value of 104°F (refer to Sections 1.10.2 and 1.10.3 of the fact sheet. Additionally, during the permit renewal process EPD reviewed discharge monitoring data and held several meetings with the permittee. It was disclosed the downstream sampling location was not representative, as the ambient temperature was taken downstream of another permitted facility's outfall; hence, the downstream data was not included in the review process. Based on the existing temperature limits in the 2015 permit and information provided by the permittee, EPD continues to believes there is a reasonable potential for the discharges to cause or contribute to an instream water quality standard violation for temperature. Part III.B of the proposed permit, provides the permittee a 60 month compliance schedule to meet several effluent limits, refer to Section 5.1 of the fact sheet detailing the schedule. EPD may revaluate the effluent

COMMENT RECEIVED	EPD RESPONSE
	limits upon completion of the compliance schedule and after additional representative effluent and ambient data has been collected.
Condition I.A.2.a., Footnote 3; Condition 1.A2.b., Footnote 3; Condition I.A.3.a., Footnote 3; and Condition I.A.3.b., Footnote 3; Consistent with Condition I.A.1.a. Footnote 4 and Condition I.A.1.b. Footnote 3, please insert the word "approximately" as it is infeasible to fill all sample containers, obtain temperature and flow measurements, etc. at exactly the same time.	The applicable permit conditions have been updated to include the word "approximately" and approximately has been defined to mean within one hour.
Condition I.A. Please note that as SNF proceeds with segregating storm water at the facility the location of the outfall(s) for process water may change. As previously discussed with GEPD, we will notify you of changes, if any, in the location (latitutde and longitude) of the process water outfalls. We anticipate that these outfall(s), if moved, would be near or between the location of the current Outfalls 002 and 003.	Comment noted. Notification of change should be provided in accordance with Part II.A.1. of the proposed permit.
Condition I.D.2: This new condition lists a date prior to the effective date for the renewed permit. SNF cannot retroactively comply with a new condition. Please change the beginning of this condition to, "Upon the effective date of this permit, the permittee…"	The federal NPDES Electronic Reporting Rule, 40 CFR Part 127 was published in October 2015 and then revised on January 4, 2021. The Phase II compliance date was updated from December 21, 2020 to December 21, 2025. The proposed permit has been updated to reflect the new date.
Condition III.A.1.: We are assuming that this condition, regarding "All previous State wastewater permits issued to this facility…are hereby revoked…" applies only to the previous versions of this NPDES discharge permit. Specifically, SNF's direct Industrial Pretreatment	The permittees interpretation is correct. Part III.A.1 of the proposed permit applies only to the previous issuance of NPDES permit no. GA0046582. The permit condition does not extend to the industrial pretreatment permit, permit no. GAP050246 or coverage under EPD's

COMMENT RECEIVED	EPD RESPONSE
Permit and its coverage under Georgia's General Permit for Storm Water Discharge are not affected by this boiler-plate condition.	General NPDES Permit for Storm Water Discharges Associated with Industrial Activity.
Summary Page – First Paragraph: The maximum flowrate of 0.137 MGD listed in the first paragraph of the Summary Page for the draft permit is incorrect. The flowrate of 0.137 MGD is the current NPDES permit average flowrate limit for an internal outfall 002A. Outfall 002A discharges through outfall 002 which includes other discharge flows. Plus, SNF Riceboro discharges water through outfall 003. Data submitted in our permit application indicates a discharge flow in the order of 0.174 MGD (total of average flows from outfalls 002 and 003) to 0.435 MGD (total of maximum flows from outfalls 002 and 002.) Modeling completed to support the discharge limits for the SNF Riceboro facility used a flowrate of 0.3 MGD process wastewater flow.	Upon review, the flow value listed on the summary page was the total design flow provided in Section I. of Application Part I. The proposed permit summary page has been revised to reflect the total maximum flow provided in Section V of Application Form 2C, which is 0.435 MGD.
Summary Page – Changes to Effluent Limitations for Outfalls 002 and 003: The numerical limits for outfalls 002 and 003 are correctly shown. However, the months for "summer" are incorrectly denoted as "November-April". These months should be "May-October".	The typographical error has been corrected in the proposed permit.
Fact Sheet, Section 2.2: As indicated in Section 2.3, 40 CFR 414 is not applicable to the discharges covered under this permit.	The typographical error has been corrected in the proposed permit.
Fact Sheet, Section 3.2: Please confirm if the 10 mg/L value for upstream total suspended solids (TSS) indicated in the table footnote is correct or if it is necessary to include this footnote in Section 3.2. We are unable to determine the basis for this value. A TSS value of 20 mg/L is shown on the spreadsheet in Appendix B of the Fact Sheet.	Section 3.2 of the fact sheet provides the correct total suspended solids value for use in the Reasonable Potential Analysis (RPA) calculations when data is unavailable and this value is 10 mg/L. The RPA found in Appendix B of the fact sheet has been updated and this change does not impact the results of the RPA.

COMMENT RECEIVED	EPD RESPONSE
Fact Sheet, Section 4.5, Temperature: The correct Georgia Rule citation for temperature for waters designated for "Fishing" is 391-3-6-.03(c)(iv) (not paragraph (a)(v), which is for drinking water suppies. Rule 391-3-6-.03(c)(iv) states, "Temperature: Not to exceed 90°F. At no time is the temperature of the receiving waters to be increased more than 5°F above intake temperature except that in estuarine waters the increase will not be more than 1.5°F."	The typographical error has been corrected in the proposed fact sheet.

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Revisions to Draft Permit

Name of Facility SNF Holding Company

NPDES Permit No. GA0046582

Were there any revisions between the draft proposed NPDES permit placed on public notice and the final proposed NPDES permit? If yes, specify: ☒ Yes ☐ No

Summary Page

- All seasonal limits were incorrectly listed as being applicable "November-April. Corrected references to effluent limitations in the summer months from "November-April" to "May-October"

Part I.A. - Effluent Limitations and Monitoring Requirements

- Revised Part I.A.2.a. footnote 3, Part 1.A2.b. footnote 3, Part I.A.3.a. footnote 3, and Part I.A.3.b. footnote 3 to revise the requirement for samples to be taken "at the same time" to require that samples be taken at "approximately the same time (within one hour)".

Part I.D – Reporting Requirements

- Updated to December 21, 2025, per the revised federal NPDES Electronic Reporting Rule.

The permittee has been made aware of these changes

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Revisions to Draft Fact Sheet

Name of Facility SNF Holding Company

NPDES Permit No. GA0046582

Were there any revisions between the draft proposed NPDES permit fact sheet placed on public notice and the final proposed NPDES permit fact sheet? If yes, specify:

Section 2.2

- The reference to 40 CFR Part 414 has been removed as it is no longer applicable to the discharges from this facility.

Section 4.5

- The Georgia Rule citation for temperature for waters with a designated use of fishing has been corrected from 391-3-6-.03(c)(iv) to 391-3-6-.03(c)(iv).

Appendix B

- Updated the upstream TSS value to 10 mg/L.

The permittee has been made aware of these changes.

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

EPD Director's Office
2 Martin Luther King, Jr. Drive
Suite 1456, East Tower
Atlanta, Georgia 30334
404-656-4713

Ms. Shamekia McGriff
Environmental and PSM Compliance Officer
SNF Holding Company
P.O. Box 250
Riceboro, Georgia 31323

12/28/2021

RE: Permit Issuance
SNF-Riceboro
NPDES Permit GA0046582
Liberty County, Ogeechee River Basin

Dear Ms. McGriff:

Pursuant to the Georgia Water Quality Control Act, as amended, the Federal Clean Water Act, as amended, and the Rules and Regulations promulgated thereunder, we have issued the attached permit for the above-referenced facility.

Your facility has been assigned to the following EPD office for reporting and compliance. Signed copies of all required reports shall be submitted to the following address:

Environmental Protection Division
Coastal District Office
400 Commerce Center Drive
Brunswick, Georgia 31523-8251

Please be advised that on and after the effective date indicated in the permit, the permittee must comply with all terms, conditions, and limitations of the permit. If you have questions concerning this correspondence, please contact Shante Bailey at 470-524-5789 or Shante.Bailey @dnr.ga.gov.

Sincerely,

Richard E. Dunn
Director

RED:sb
Enclosure(s)
CC: EPD Compliance Office Coastal District Office- Brunswick – Tracy Perkins (E-mail)
EPD Watershed Planning and Monitoring Program, Mr. Josh Welte (e-mail)
EPD Watershed Planning and Monitoring Program, Mr. Tyler Parsons (e-mail)

Permit No. GA0046582
Issuance Date: 12/28/2021

GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

National Pollutant Discharge Elimination System Permit

In accordance with the provisions of the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended), hereinafter called the State Act; the Federal Water Pollution Control Act, as amended (33 U.S. C. 1251 et seq.), hereinafter called the Federal Act; and the Rules and Regulations promulgated pursuant to each of these Acts,

SNF Holding Company
P.O. Box 250
Riceboro, Georgia 31323

is issued a permit to discharge from a facility located at

SNF-Riceboro
1 Chemical Plant Road
Riceboro, Georgia 31323
Liberty County

to receiving waters

Riceboro Creek (Outfall 002 and Outfall 003) in the Ogeechee River Basin.

in accordance with effluent limitations, monitoring requirements and other conditions set forth in the permit.

This permit is issued in reliance upon the permit application signed on February 27, 2020, any other applications upon which this permit is based, supporting data entered therein or attached thereto, and any subsequent submittal of supporting data.

This permit shall become effective on January 1, 2022.

This permit and the authorization to discharge shall expire at midnight December 31, 2026.

STATE OF GEORGIA
CONSTITUTION
WISDOM
JUSTICE
MODERATION
1776

Richard E. Dunn, Director
Environmental Protection Division

PART I

A.1.a Effluent Limitations and Monitoring Requirements

Upon the effective date of the permit and continuing for 60 months, the permittee is authorized to discharge from outfall numbers 002 (31.743870, -81.431620) and 003 (31.744540, -81.437620) combined– miscellaneous utility water, thermal oxidizer scrubber blowdown, and storm water runoff.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristics (Units)	Discharge Limitations[1]				Monitoring Requirements[2]		
	Mass Based (lbs/day)		Concentration Based (mg/L)		Measurement Frequency	Sample Type	Sample Location
	Daily Avg.	Daily Max.	Daily Avg.	Daily Max.			
Flow (MGD)[4]	Report	Report			1/Month	Calculated	Final Effluent
$CBOD_5$ (November-April)[3,4]	Report	Report			1/Month	Calculated	Final Effluent
$CBOD_5$ (May-October)[3,4]	Report	Report			1/Month	Calculated	Final Effluent
Ammonia, as N[3,4] (November-April)	Report	Report			1/Month	Calculated	Final Effluent
Ammonia, as N[3,4] (May-October)	Report	Report			1/Month	Calculated	Final Effluent
Total Phosphorus[3,5] (November-April)	Report	Report			1/Month	Calculated	Final Effluent
Total Phosphorus[3,5] (May-October)	Report	Report			1/Month	Calculated	Final Effluent

1 Effluent limitations for 5-day carbonaceous biochemical oxygen demand, ammonia (as N), and total phosphorus are for the sum of the discharges from outfalls 002 and 003. Individual parameter sampling requirements for outfalls 002 and 003 can be found in Part I.A.2-3 of the permit.

2 All the parameters must be monitored, at a minimum, at the measurement frequency stated above if there is any discharge. If there is no discharge, state such in the discharge monitoring report in accordance with the reporting requirements in Part 1.D of this permit.

3 See Schedule of Compliance Part III.B of this permit.

4 Sampling for $CBOD_5$, dissolved oxygen, ammonia, temperature and flow recording shall be taken at approximately the same time (within one hour) on the same date for outfall 002 and 003. The mass shall be calculated using the flow measurement on the date sampling is conducted.

5 Sampling for phosphorus and flow recording shall be taken at approximately the same time (within one hour) on the same date for outfall 002 and 003. The mass shall be calculated using the flow measurement on the date sampling is conducted.

PART I

A.1.b Effluent Limitations and Monitoring Requirements

Effective 60 months from the effective date of the permit and continuing until the expiration date of the permit, the permittee is authorized to discharge from outfall numbers 002 (31.743870, -81.431620) and 003 (31.744540, -81.437620) combined– miscellaneous utility water, thermal oxidizer scrubber blowdown, and storm water runoff.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristics (Units)	Discharge Limitations[1]				Monitoring Requirements[2]		
	Mass Based (lbs/day)		Concentration Based (mg/L)		Measurement Frequency	Sample Type	Sample Location
	Daily Avg.	Daily Max.	Daily Avg.	Daily Max.			
Flow (MGD)	Report	Report			1/Month	Calculated	Final Effluent
$CBOD_5$ (November-April)[3]	220.3	330.5			1/Month	Calculated	Final Effluent
$CBOD_5$ (May-October)[3]	49.0	73.5			1/Month	Calculated	Final Effluent
Ammonia, as N[3] (November-April)	17.2	25.8			1/Month	Calculated	Final Effluent
Ammonia, as N[3] (May-October)	1.1	1.7			1/Month	Calculated	Final Effluent
Total Phosphorus[4] (November-April)	13.3	20.0			1/Month	Calculated	Final Effluent
Total Phosphorus[4] (May-October)	4.4	6.6			1/Month	Calculated	Final Effluent

1 Effluent limitations for 5-day carbonaceous biochemical oxygen demand, ammonia (as N), and total phosphorus are for the sum of the discharges from outfalls 002 and 003. Individual parameter sampling requirements for outfalls 002 and 003 can be found in Part I.A.2-3 of the permit.

2 All the parameters must be monitored, at a minimum, at the measurement frequency stated above if there is any discharge. If there is no discharge, state such in the discharge monitoring report in accordance with the reporting requirements in Part 1.D of this permit.

3 Sampling for $CBOD_5$, dissolved oxygen, ammonia, temperature and flow recording shall be taken at approximately the same time (within one hour) on the same date for outfall 002 and 003. The mass shall be calculated using the flow measurement on the date sampling is conducted.

4 Sampling for phosphorus and flow recording shall be taken at approximately the same time (within one hour) on the same date for outfall 002 and 003. The mass shall be calculated using the flow measurement on the date sampling is conducted.

A.2.a Effluent Limitations and Monitoring Requirements

Upon the effective date of the permit and continuing for 60 months, the permittee is authorized to discharge from outfall number 002[1] (31.743870, -81.431620) – miscellaneous utility water, thermal oxidizer scrubber blowdown (002A), and storm water runoff.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristics (Units)	Discharge Limitations				Monitoring Requirements[2]		
	Mass Based (lbs/day)		Concentration Based (mg/L)		Measurement Frequency	Sample Type	Sample Location
	Daily Avg.	Daily Max.	Daily Avg.	Daily Max.			
Flow (MGD)[3]	Report	Report			1/Month	Instantaneous	Final Effluent
$CBOD_5$[3]	Report	Report	Report	Report	1/Month	Grab	Final Effluent
Dissolved Oxygen[10]				Report	1/Month	Grab	Final Effluent
Total Phosphorus[5]	Report	Report	Report	Report	1/Month	Grab	Final Effluent
Orthophosphate, as P[5]			Report	Report	1/Month	Grab	Final Effluent
Ammonia, as N[3,6]	Report	Report	Report	Report	1/Month	Grab	Final Effluent
Total Kjeldahl Nitrogen [6]			Report	Report	1/Month	Grab	Final Effluent
Nitrate-Nitrite[6]			Report	Report	1/Month	Grab	Final Effluent
Organic Nitrogen[7]			Report	Report	1/Month	Calculated[7]	Final Effluent
Total Residual Chlorine[10]				Report	1/Month	Grab	Final Effluent
Acrylamide			Report	55	1/Month	Grab	Final Effluent
Temperature (ºF)[3]				90	1/Month	Grab	Final Effluent
Temperature Differential (ºF)				Δ +1.5º	1/Month	Calculated[8]	See Note 8
Chronic Whole Effluent Toxicity[9]				Report	See footnote 9	Composite	Final Effluent

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored once per week by grab sample.

[1] There shall be no discharge of floating solids or visible foam other than trace amounts.

[2] All the parameters must be monitored, at a minimum, at the measurement frequency stated above if there is any discharge. If there is no discharge, state such in the discharge monitoring report in accordance with the reporting requirements in Part 1.D of this permit.

[3] Sampling for $CBOD_5$, dissolved oxygen, ammonia, temperature and flow recording shall be taken at approximately the same time (within one hour).

[4] Dissolved Oxygen limit is to be reported as the daily minimum.

[5] Total phosphorus and orthophosphate shall be analyzed from the same effluent sample.

[6] Total Kjeldahl nitrogen, nitrate-nitrite, and ammonia shall be analyzed from the same effluent sample.

[7] Organic nitrogen should be calculated as total Kjeldahl nitrogen minus ammonia.

[8] The permittee shall monitor the upstream and downstream temperature of the receiving waters and report on the OMR. Monitoring shall occur upstream at the Highway 17 bridge and downstream at a location upstream of the permitted discharge from Interstate Paper, LLC (NPDES Permit No. GA0003590). At no time is the temperature of the downstream receiving waters to be increased by more than 1.5°F above the upstream receiving waters temperature.

[9] WET testing shall be conducted once during the permit term and the results submitted to the EPD in accordance with Part I.D of this permit. An additional WET test shall be conducted and submitted as part of the next application for NPDES permit reissuance. The testing must comply with the most current U.S. Environmental Protection Agency (EPA) chronic aquatic toxicity testing manuals. The referenced document is entitled Short-Term Methods of Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, 3rd Edition, U.S. EPA, 821-R-02-014, October 2002. Definitive tests must be run on the samples concurrently using both an invertebrate species (i.e. Mysid Shrimp, Americamysis bahia) and a vertebrate species (i.e. Sheepshead Minnow, Cyprinodon variegatus) and shall include a dilution equal to the facility's instream waste concentration (IWC) of 1.4%.

[10] See Schedule of Compliance Part III.B of this permit.

A.2.b Effluent Limitations and Monitoring Requirements

Effective 60 months from the effective date of the permit and continuing until the expiration date of the permit, the permittee is authorized to discharge from outfall number 002[1] (31.743870, -81.431620) – miscellaneous utility water, thermal oxidizer scrubber blowdown (002A), and storm water runoff.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristics (Units)	Discharge Limitations				Monitoring Requirements[2]		
	Mass Based (lbs/day)		Concentration Based (mg/L)		Measurement Frequency	Sample Type	Sample Location
	Daily Avg.	Daily Max.	Daily Avg.	Daily Max.			
Flow (MGD)[3]	Report	Report			1/Month	Instantaneous	Final Effluent
$CBOD_5$[3]	Report	Report	Report	Report	1/Month	Grab	Final Effluent
Dissolved Oxygen[3]				3.5[4]	1/Month	Grab	Final Effluent
Total Phosphorus[5]	Report	Report	Report	Report	1/Month	Grab	Final Effluent
Orthophosphate, as P[5]			Report	Report	1/Month	Grab	Final Effluent
Ammonia, as N[3,6]	Report	Report	Report	Report	1/Month	Grab	Final Effluent
Total Kjeldahl Nitrogen [6]			Report	Report	1/Month	Grab	Final Effluent
Nitrate-Nitrite[6]			Report	Report	1/Month	Grab	Final Effluent
Organic Nitrogen[7]			Report	Report	1/Month	Calculated[7]	Final Effluent
Total Residual Chlorine				0.5	1/Month	Grab	Final Effluent
Acrylamide			Report	55	1/Month	Grab	Final Effluent
Temperature (ºF)[3]				90	1/Month	Grab	Final Effluent
Temperature Differential (ºF)				Δ +1.5º	1/Month	Calculated[8]	See Note 8
Chronic Whole Effluent Toxicity[9]				Report	See footnote 9	Composite	Final Effluent

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored once per week by grab sample.

[1] There shall be no discharge of floating solids or visible foam other than trace amounts.

[2] All the parameters must be monitored, at a minimum, at the measurement frequency stated above if there is any discharge. If there is no discharge, state such in the discharge monitoring report in accordance with the reporting requirements in Part 1.D of this permit.

[3] Sampling for $CBOD_5$, dissolved oxygen, ammonia, temperature and flow recording shall be taken at approximately the same time (within one hour)

[4] Dissolved oxygen limit is to be reported as the daily minimum.

[5] Total phosphorus and orthophosphate shall be analyzed from the same effluent sample.

[6] Total Kjeldahl nitrogen, nitrate-nitrite, and ammonia shall be analyzed from the same effluent sample.

[7] Organic nitrogen should be calculated as total Kjeldahl nitrogen minus ammonia.

[8] The permittee shall monitor the upstream and downstream temperature of the receiving waters. The individual data shall be reported on OMR and the delta shall be reported on the DMR. Monitoring shall occur upstream at the Highway 17 bridge and downstream at a location outside of the influence of other NPDES permitted discharges (for example, upstream of the permitted outfalls at Interstate Paper, LLC NPDES Permit No. GA0003590). At no time is the temperature of the downstream receiving waters to be increased by more than 1.5°F above the upstream receiving waters temperature.

[9] WET testing shall be conducted once during the permit term and the results submitted to the EPD in accordance with Part I.D of this permit. An additional WET test shall be conducted and submitted as part of the next application for NPDES permit reissuance. The testing must comply with the most current U.S. Environmental Protection Agency (EPA) chronic aquatic toxicity testing manuals. The referenced document is entitled Short-Term Methods of Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, 3rd Edition, U.S. EPA, 821-R-02-014, October 2002. Definitive tests must be run on the samples concurrently using both an invertebrate species (i.e. Mysid Shrimp, Americamysis bahia) and a vertebrate species (i.e. Sheepshead Minnow, Cyprinodon variegatus) and shall include a dilution equal to the facility's instream waste concentration (IWC) of 1.4%.

A.3.a. Effluent Limitations and Monitoring Requirements

Upon the effective date of the permit and continuing for 60 months, the permittee is authorized to discharge from outfall number 003[1] (31.744540, -81.437620) – miscellaneous utility water and stormwater.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristics (Units)	Discharge Limitations				Monitoring Requirements[2]		
	Mass Based (lbs/day)		Concentration Based (mg/L)		Measurement Frequency	Sample Type	Sample Location
	Daily Avg.	Daily Max.	Daily Avg.	Daily Max.			
Flow (MGD)[3]	Report	Report			1/Month	Instantaneous	Final Effluent
$CBOD_5$[3]	Report	Report	Report	Report	1/Month	Grab	Final Effluent
Dissolved Oxygen[10]				Report	1/Month	Grab	Final Effluent
Total Phosphorus[5]	Report	Report	Report	Report	1/Month	Grab	Final Effluent
Orthophosphate, as P[5]			Report	Report	1/Month	Grab	Final Effluent
Ammonia, as N[3,6]	Report	Report	Report	Report	1/Month	Grab	Final Effluent
Total Kjeldahl Nitrogen[6]			Report	Report	1/Month	Grab	Final Effluent
Nitrate-Nitrite[6]			Report	Report	1/Month	Grab	Final Effluent
Organic Nitrogen[7]			Report	Report	1/Month	Calculated[7]	Final Effluent
Temperature (°F)[3]				90	1/Month	Grab	Final Effluent
Temperature Differential (°F)				Δ +1.5°	1/Month	Calculated[8]	See Note 8
Chronic Whole Effluent Toxicity[9]				Report	See footnote 9	Composite	Final Effluent

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored once per month by grab sample.

[1] There shall be no discharge of floating solids or visible foam in other than trace amounts.

[2] All the parameters must be monitored if there is any discharge. If there is no discharge, state such in the discharge monitoring report in accordance with the reporting requirements in Part 1.B.2 of this permit.

[3] Sampling for $CBOD_5$, and dissolved oxygen, ammonia, temperature and flow recording shall be taken at approximately the same time (within one hour).

[4] Dissolved oxygen limit is to be reported as the daily minimum.

[5] Total phosphorus and orthophosphate shall be analyzed from the same effluent sample.

[6] Total Kjeldahl Nitrogen, nitrate-nitrite, and ammonia shall be analyzed from the same effluent sample.

[7] Organic nitrogen should be calculated as TKN minus Ammonia.

[8] The permittee shall monitor the upstream and downstream temperature of the receiving waters. The individual data shall be reported on OMR and the delta shall be reported on the DMR. Monitoring shall occur upstream at the Highway 17 bridge and downstream at a location outside of the influence of other NPDES permitted discharges (for example, upstream of the permitted outfalls at Interstate Paper, LLC NPDES Permit No. GA0003590). At no time is the temperature of the downstream receiving waters to be increased by more than 1.5°F above the upstream receiving waters temperature.

[9] WET testing shall be conducted once during the permit term and the results submitted to the EPD in accordance with Part I.D of this permit. An additional WET test shall be conducted and submitted as part of the next application for NPDES permit reissuance. The testing must comply with the most current U.S. Environmental Protection Agency (EPA) chronic aquatic toxicity testing manuals. The referenced document is entitled Short-Term Methods of Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, 3rd Edition, U.S. EPA, 821-R-02-014, October 2002. Definitive tests must be run on the samples concurrently using both an invertebrate species (i.e. Mysid Shrimp, Americamysis bahia) and a vertebrate species (i.e. Sheepshead Minnow, Cyprinodon variegatus) and shall include a dilution equal to the facility's instream waste concentration (IWC) of 1.4%.

[10] See Schedule of Compliance Part III.B of this permit.

A.3.b. Effluent Limitations and Monitoring Requirements

Effective 60 months from the effective date of the permit and continuing until the expiration date of the permit, the permittee is authorized to discharge from outfall number 003[1] (31.744540, -81.437620) – miscellaneous utility water and stormwater.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristics (Units)	Discharge Limitations				Monitoring Requirements[2]		
	Mass Based (lbs/day)		Concentration Based (mg/L)		Measurement Frequency	Sample Type	Sample Location
	Daily Avg.	Daily Max.	Daily Avg.	Daily Max.			
Flow (MGD)[3]	Report	Report			1/Month	Instantaneous	Final Effluent
$CBOD_5$[3]	Report	Report	Report	Report	1/Month	Grab	Final Effluent
Dissolved Oxygen[3]				3.5[4]	1/Month	Grab	Final Effluent
Total Phosphorus[5]	Report	Report	Report	Report	1/Month	Grab	Final Effluent
Orthophosphate, as P[5]			Report	Report	1/Month	Grab	Final Effluent
Ammonia, as N[3,6]	Report	Report	Report	Report	1/Month	Grab	Final Effluent
Total Kjeldahl Nitrogen[6]			Report	Report	1/Month	Grab	Final Effluent
Nitrate-Nitrite[6]			Report	Report	1/Month	Grab	Final Effluent
Organic Nitrogen[7]			Report	Report	1/Month	Calculated[7]	Final Effluent
Temperature (°F)[3]				90	1/Month	Grab	Final Effluent
Temperature Differential (°F)				Δ +1.5°	1/Month	Calculated[8]	See Note 8
Chronic Whole Effluent Toxicity[9]				Report	See footnote 9	Composite	Final Effluent

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored once per month by grab sample.

[1] There shall be no discharge of floating solids or visible foam in other than trace amounts.

[2] All the parameters must be monitored if there is any discharge. If there is no discharge, state such in the discharge monitoring report in accordance with the reporting requirements in Part 1.B.2 of this permit.

[3] Sampling for $CBOD_5$, and dissolved oxygen, ammonia, temperature and flow recording shall be taken at approximately the same time (within one hour).

[4] Dissolved oxygen limit is to be reported as the daily minimum.

[5] Total phosphorus and orthophosphate shall be analyzed from the same effluent sample.

[6] Total Kjeldahl Nitrogen, nitrate-nitrite, and ammonia shall be analyzed from the same effluent sample.

[7] Organic nitrogen should be calculated as TKN minus Ammonia.

[8] The permittee shall monitor the upstream and downstream temperature of the receiving waters. The individual data shall be reported on OMR and the delta shall be reported on the DMR. Monitoring shall occur upstream at the Highway 17 bridge and downstream at a location outside of the influence of other NPDES permitted discharges (for example, upstream of the permitted outfalls at Interstate Paper, LLC NPDES Permit No. GA0003590). At no time is the temperature of the downstream receiving waters to be increased by more than 1.5°F above the upstream receiving waters temperature.

[9] WET testing shall be conducted once during the permit term and the results submitted to the EPD in accordance with Part I.D of this permit. An additional WET test shall be conducted and submitted as part of the next application for NPDES permit reissuance. The testing must comply with the most current U.S. Environmental Protection Agency (EPA) chronic aquatic toxicity testing manuals. The referenced document is entitled Short-Term Methods of Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, 3rd Edition, U.S. EPA, 821-R-02-014, October 2002. Definitive tests must be run on the samples concurrently using both an invertebrate species (i.e. Mysid Shrimp, Americamysis bahia) and a vertebrate species (i.e. Sheepshead Minnow, Cyprinodon variegatus) and shall include a dilution equal to the facility's instream waste concentration (IWC) of 1.4%.

B. Monitoring

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. The permittee shall maintain a written sampling plan and schedule onsite.

2. Sampling Period

a. Unless otherwise specified in this permit, quarterly samples shall be taken during the periods January-March, April-June, July-September, and October-December.

b. Unless otherwise specified in this permit, semiannual samples shall be taken during the periods January-June and July-December.

c. Unless otherwise specified in this permit, annual samples shall be taken during the period of January-December.

3. Monitoring Procedures

Analytical methods, sample containers, sample preservation techniques, and sample holding times must be consistent with the techniques and methods listed in 40 CFR Part 136. The analytical method used shall be sufficiently sensitive. EPA-approved methods must be applicable to the concentration ranges of the NPDES permit samples.

4. Detection Limits

All parameters will be analyzed using the appropriate detection limits. If the results for a given sample are such that a parameter is not detected at or above the specified detection limit, a value of "NOT DETECTED" will be reported for that sample and the detection limit will also be reported.

5. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

a. The exact place, date, and time of sampling or measurements, and the person(s) performing the sampling or the measurements;

b. The dates and times the analyses were performed, and the person(s) performing the analyses;

c. The analytical techniques or methods used;

d. The results of all required analyses.

6. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report. Such increased monitoring frequency shall also be indicated. EPD may require, by written notification, more frequent monitoring or the monitoring of other pollutants not required in this permit.

7. Records Retention

The permittee shall retain records of all monitoring information, including all records of analyses performed, calibration and maintenance of instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a minimum of three (3) years from the date of the sample, measurement, report or application, or longer if requested by EPD.

8. Penalties

The Federal Clean Water Act and the Georgia Water Quality Control Act provide that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit, makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine or by imprisonment, or by both. The Federal Clean Water Act and the Georgia Water Quality Control Act also provide procedures for imposing civil penalties which may be levied for violations of the Act, any permit condition or limitation established pursuant to the Act, or negligently or intentionally failing or refusing to comply with any final or emergency order of the Director of EPD

C. Definitions

1. The "daily average" mass means the total discharge by mass during a calendar month divided by the number of days in the month that the production or commercial facility was operating. Where less than daily sampling is required by this permit, the daily average discharge shall be determined by the summation of all the measured daily discharges by weight divided by the number of days sampled during the calendar month when the measurements were made.

2. The "daily maximum" mass means the total discharge by mass during any calendar day.

3. The "daily average" concentration means the arithmetic average of all the daily determinations of concentrations made during a calendar month. Daily determinations of concentration made using a composite sample shall be the concentration of the composite sample.

4. The "daily maximum" concentration means the daily determination of concentration for any calendar day.

5. A “calendar day” is defined as any consecutive 24-hour period.

6. "Bypass" means the intentional diversion of waste streams from any portion of a treatment facility.

7. "Severe property damage" means substantial physical damage to property, damage to treatment facilities that causes them to become inoperable, or substantial and permanent loss of natural resources that can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

8. “EPD” as used herein means the Environmental Protection Division of the Department of Natural Resources.

9. “State Act” as used herein means the Georgia Water Quality Control Act (Official Code of Georgia Annotated; Title 12, Chapter 5, Article 2).

10. “Rules” as used herein means the Georgia Rules and Regulations for Water Quality Control.

D. Reporting Requirements

1. The permittee must electronically report the DMR, OMR and additional monitoring data using the web based electronic NetDMR reporting system, unless a waiver is granted by EPD.

a. The permittee must comply with the Federal National Pollutant Discharge Elimination System Electronic Reporting regulations in 40 CFR §127. The permittee must electronically report the DMR, OMR, and additional monitoring data using the web based electronic NetDMR reporting system online at: https://netdmr.epa.gov/netdmr/public/home.htm

b. Monitoring results obtained during the calendar month shall be summarized for each month and reported on the DMR. The results of each sampling event shall be reported on the OMR and submitted as an attachment to the DMR.

c. The permittee shall submit the DMR, OMR and additional monitoring data no later than 11:59 p.m. on the 15th day of the month following the sampling period.

d. All other reports required herein, unless otherwise stated, shall be submitted to the EPD Office listed on the permit issuance letter signed by the Director of EPD.

2. No later than December 21, 2025, the permittee must electronically report the following compliance monitoring data and reports using the online web based electronic system approved by EPD, unless a waiver is granted by EPD:

a. Sewer Overflow/Bypass Event Reports;
b. Noncompliance Notification;
c. Other noncompliance; and
d. Bypass

3. Other Reports

All other reports required in this permit not listed above in Part I.D.2 or unless otherwise stated, shall be submitted to the EPD Office listed on the permit issuance letter signed by the Director of EPD.

4. Other Noncompliance

All instances of noncompliance not reported under Part I.B. and Part II. A. shall be reported to EPD at the time the monitoring report is submitted.

5. Signatory Requirements

All reports, certifications, data or information submitted in compliance with this permit or requested by EPD must be signed and certified as follows:

a. Any State or NPDES Permit Application form submitted to the EPD shall be signed as follows in accordance with the Federal Regulations, 40 C.F.R. 122.22:

1. For a corporation, by a responsible corporate officer. A responsible corporate officer means:

i. a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision making functions for the corporation, or

ii. the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

2. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or

3. For a municipality, State, Federal, or other public facility, by either a principal executive officer or ranking elected official.

b. All other reports or requests for information required by the permit issuing authority shall be signed by a person designated in (a) above or a duly authorized representative of such person, if:

1. The representative so authorized is responsible for the overall operation of the facility from which the discharge originates, e.g., a plant manager, superintendent or person of equivalent responsibility;

2. The authorization is made in writing by the person designated under (a) above; and

3. The written authorization is submitted to the Director.

c. Any changes in written authorization submitted to the permitting authority under (b) above which occur after the issuance of a permit shall be reported to the permitting authority by submitting a copy of a new written authorization which meets the requirements of (b) and (b.1) and (b.2) above.

d. Any person signing any document under (a) or (b) above shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

PART II

A. Management Requirements

1. Notification of Changes

a. The permittee shall provide EPD at least 90 days advance notice of any planned physical alterations or additions to the permitted facility that meet the following criteria:

1. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR 122.29(b);

2. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements under 40 CFR 122.42(a)(1); or

3. The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan.

b. The permittee shall give at least 90 days advance notice to EPD of any planned changes to the permitted facility or activity which may result in noncompliance with permit requirements.

c. Following the notice in paragraph a. or b. of this condition the permit may be modified. The permittee shall not make any changes, or conduct any activities, requiring notification in paragraph a. or b. of this condition without approval from EPD.

d. The permittee shall provide at least 30 days advance notice to EPD of:

1. any planned expansion or increase in production capacity; or

2. any planned installation of new equipment or modification of existing processes that could increase the quantity of pollutants discharged or result in the discharge of pollutants that were not being discharged prior to the planned change

if such change was not identified in the permit application(s) upon which this permit is based and for which notice was not submitted under paragraphs a. or b. of this condition.

e. All existing manufacturing, commercial, mining, and silvicultural dischargers shall notify EPD as soon as it is known or there is reason to believe that any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant not limited in the permit, if that discharge will exceed (i) 100 µg/L, (ii) five times the maximum concentration reported for that pollutant in the permit application, or (iii) 200 µg/L for acrolein and acrylonitrile, 500 µg/L for 2,4 dinitrophenol and for 2-methyl-4-6-dinitrophenol, or 1 mg/L antimony.

f. All existing manufacturing, commercial, mining, and silvicultural dischargers shall notify EPD as soon as it is known or there is reason to believe that any activity has occurred or will occur which would result in any discharge on a nonroutine or infrequent basis, of any toxic pollutant not limited in the permit, if that discharge will exceed (i) 500 µg/L, (ii) ten times the maximum concentration reported for that pollutant in the permit application, or (iii) 1 mg/L antimony.

g. Upon the effective date of this permit, the permittee shall submit to EPD an annual certification in June of each year certifying whether or not there has been any change in processes or wastewater characteristics as described in the submitted NPDES permit application that required notification in paragraph a., b., or d. of this condition. The permittee shall also certify annually in June whether the facility has received offsite wastes or wastewater and detail any such occurrences.

2. Noncompliance Notification

If, for any reason, the permittee does not comply with, or will be unable to comply with any effluent limitation specified in this permit, the permittee shall provide EPD with an oral report within 24 hours from the time the permittee becomes aware of the circumstances followed by a written report within five (5) days of becoming aware of such condition. The written submission shall contain the following information:

a. A description of the discharge and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.

3. Facility Operation

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

4. Adverse Impact

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

5. Bypassing

a. If the permittee knows in advance of the need for a bypass, it shall submit prior notice to EPD at least 10 days (if possible) before the date of the bypass. The permittee shall submit notice of any unanticipated bypass with an oral report within 24 hours from the time the permittee becomes aware of the circumstances followed by a written report within five (5) days of becoming aware of such condition. The written submission shall contain the following information:

1. A description of the discharge and cause of noncompliance; and

2. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

b. Any diversion or bypass of facilities covered by this permit is prohibited, except (i) where unavoidable to prevent loss of life, personal injury, or severe property damage; (ii) there were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime (this condition is not satisfied if the permittee could have installed adequate back-up equipment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance); and (iii) the permittee submitted a notice as required above. The permittee shall operate the treatment works, including the treatment plant and total sewer system, to minimize discharge of the pollutants listed in Part I of this permit from combined sewer overflows or bypasses. Upon written notification by EPD, the permittee may be required to submit a plan and schedule for reducing bypasses, overflows, and infiltration in the system.

6. Sludge Disposal Requirements

Sludge shall be disposed of in accordance with the regulations and guidelines established by EPD, the Federal Clean Water Act, and the Resource Conservation and Recovery Act (RCRA). Prior to disposal of sludge by any method other than co-disposal in a permitted sanitary landfill, the permittee shall submit a sludge management plan to the Watershed Protection Branch of EPD for written approval. For land application of nonhazardous sludge, the permittee shall comply with the applicable criteria outlined in the most current version of EPD's "Guidelines for Land Application of Sewage Sludge (Biosolids) at Agronomic Rates" and with the State Rules, Chapter 391-3-6-.17. EPD may require more stringent control of this activity. Prior to land applying nonhazardous sludge, the permittee

shall submit a sludge management plan to EPD for review and approval. Upon approval, the plan for land application will become a part of the NPDES permit upon modification of the permit.

7. Sludge Monitoring Requirements

The permittee shall develop and implement procedures to ensure adequate year-round sludge disposal. The permittee shall monitor the volume and concentration of solids removed from the plant. Records shall be maintained which document the quantity of solids removed from the plant. The ultimate disposal of solids shall be reported (in the unit of lbs) as specified in Part I.D of this permit.

8. Power Failures

Upon the reduction, loss, or failure of the primary source of power to said water pollution control facilities, the permittee shall use an alternative source of power if available to reduce or otherwise control production and/or all discharges in order to maintain compliance with the effluent limitations and prohibitions of this permit.

If such alternative power source is not in existence, and no date for its implementation appears in Part I, the permittee shall halt, reduce or otherwise control production and/or all discharges from wastewater control facilities upon the reduction, loss, or failure of the primary source of power to said wastewater control facilities.

9. Operator Certification Requirements

The permittee shall ensure that, when required, a certified operator is in charge of the facility in accordance with Georgia State Board of Examiners for Certification of Water and Wastewater Treatment Plant operators And Laboratory Analysts Rule 43-51-6.(b)

10. Laboratory Analyst Certification Requirements

The permittee shall ensure that, when required, the person in responsible charge of the laboratory performing the analyses for determining permit compliance is certified in accordance with the Georgia Certification of Water and Wastewater Treatment Plant operators and Laboratory Analysts Act, as amended, and the Rules promulgated thereunder.

B. Responsibilities

1. Right of Entry

The permittee shall allow the Director of EPD, the Regional Administrator of EPA, and/or their authorized representatives, agents, or employees, upon the presentation of credentials:

a. To enter upon the permittee's premises where a discharge source is located or in which any records are required to be kept under the terms and conditions of this permit; and

b. At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and to sample any substance or parameters in any location.

2. Transfer of Ownership or Control

A permit may be transferred to another person by a permittee if:

a. The permittee notifies the Director of EPD in writing of the proposed transfer at least thirty (30) days in advance of the proposed transfer;

b. A written agreement containing a specific date for transfer of permit responsibility and coverage between the current and new permittee (including acknowledgement that the existing permittee is liable for violations up to that date, and that the new permittee is liable for violations from that date on) is submitted to the Director at least thirty (30) days in advance of the proposed transfer; and

c. The Director, within thirty (30) days, does not notify the current permittee and the new permittee of EPD’s intent to modify, revoke and reissue, or terminate the permit and to require that a new application be filed rather than agreeing to the transfer of the permit.

3. Availability of Reports

Except for data deemed to be confidential under O.C.G.A. § 12-5-26 or by the Regional Administrator of the EPA under the Code of Federal Regulations, Title 40, Part 2, all reports prepared in accordance with the terms of this permit shall be available for public inspection at an office of EPD. Effluent data, permit applications, permittee's names and addresses, and permits shall not be considered confidential.

4. Permit Modification

This permit may be modified, suspended, revoked or reissued in whole or in part during its term for cause including, but not limited to, the following:

a. Violation of any conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge; or

d. To comply with any applicable effluent limitation issued pursuant to the order of the United States District Court for the District of Columbia issued on June 8, 1976, in Natural Resources Defense Council, Inc. et.al. v. Russell E. Train, 8 ERC 2120(D.D.C. 1976), if the effluent limitation so issued:

1. is different in conditions or more stringent than any effluent limitation in the permit; or

2. controls any pollutant not limited in the permit.

5. Toxic Pollutants

The permittee shall comply with effluent standards or prohibitions established pursuant to Section 307(a) of the Federal Clean Water Act for toxic pollutants, which are present in the discharge within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

6. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

7. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Federal Clean Water Act.

8. Water Quality Standards

Nothing in this permit shall be construed to preclude the modification of any condition of this permit when it is determined that the effluent limitations specified herein fail to achieve the applicable State water quality standards.

9. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

10. Expiration of Permit

The permittee shall not discharge after the expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit such information, forms, and fees as are required by EPD at least 180 days prior to the expiration date.

11. Contested Hearings

Any person who is aggrieved or adversely affected by an action of the Director of EPD shall petition the Director for a hearing within thirty (30) days of notice of such action.

12. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

13. Best Management Practices

The permittee will implement best management practices to control the discharge of hazardous and/or toxic materials from ancillary manufacturing activities. Such activities include, but are not limited to, materials storage, in-plant transfer, process and material handling, loading and unloading operations, plant site runoff, and sludge and waste disposal.

14. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

15. Duty to Provide Information

a. The permittee shall furnish to the EPD Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The permittee shall also furnish upon request copies of records required to be kept by this permit.

b. When the permittee becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in a permit application or any report to the Director, it shall promptly submit such facts and information.

16. Duty to Comply

a. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Georgia Water Quality Control Act (O.C.G.A. § 12-5-20 et. seq.) and is grounds for enforcement action; for permit termination; revocation and reissuance, or modification; or for denial of a permit renewal application. Any instances of noncompliance must be reported to EPD as specified in Part I. D and Part II.A. of this permit.

b. Penalties for violations of permit conditions. The Federal Clean Water Act and the Georgia Water Quality Control Act (O.C.G.A. § 12-5-20 et. seq.) provide that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under this permit, makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction be punished by a fine or by imprisonment, or by both. The Georgia Water Quality Control Act (Act) also provides procedures for imposing civil penalties which may be levied for violations of the Act, any permit condition or limitation established pursuant to the Act, or negligently or intentionally failing or refusing to comply with any final or emergency order of the Director**.**

17. Upset Provisions

Provisions of 40 CFR 122.41(n)(1)-(4), regarding "Upset" shall be applicable to any civil, criminal, or administrative proceeding brought to enforce this permit.

PART III

A. Previous Permits

1. All previous State wastewater permits issued to this facility, whether for construction or operation, are hereby revoked by the issuance of this permit. This action is taken to assure compliance with the Georgia Water Quality Control Act, as amended, and the Federal Clean Water Act, as amended. Receipt of the permit constitutes notice of such action. The conditions, requirements, terms and provisions of this permit authorizing discharge under the National Pollutant Discharge Elimination System govern discharges from this facility.

B. Schedule of Compliance

1. The permittee shall achieve compliance with the effluent limitations specified for discharges in accordance with the following schedule:

a. The effluent limitations and monitoring specified in Part I A.1., A.2, and A.3 are effective on the effective date of this permit, except as specified below.

b. The permittee shall achieve compliance with the $CBOD_5$, ammonia, and total phosphorus specified in Part I A.1. of this permit in accordance with the following schedule:

(i) Beginning on the effective date of this permit and continuing for 60 months, the permittee shall start monitoring and reporting for $CBOD_5$, ammonia, and total phosphorus in accordance with Part I A.1.a of this permit.

(ii) Within 60 months of the effective date of this permit, the permittee shall achieve compliance with the $CBOD_5$, ammonia, and total phosphorus limits specified in Part I A.1.b. of this permit.

c. The permittee shall achieve compliance with the total residual chlorine limitation specified in Part I A.2. of this permit in accordance with the following schedule:

(i) Beginning on the effective date of this permit and continuing for 60 months, the permittee shall start monitoring and reporting for total residual chlorine in accordance with Part I A.2.a. of this permit.

(ii) Within 60 months of the effective date of this permit, the permittee shall achieve compliance with the total residual chlorine limit specified in Part I A.2.b. of this permit.

d. The permittee shall achieve compliance with the dissolved oxygen limitation specified in Part I A.2. and A.3. of this permit in accordance with the following schedule:

(i) Beginning on the effective date of this permit and continuing for 60 months, the permittee shall start monitoring and reporting for dissolved oxygen in accordance with Part I A.2.a. and A.3.a. of this permit.

(ii) Within 60 months of the effective date of this permit, the permittee shall achieve compliance with the dissolved oxygen limit specified in Part I A.2.b. and A3.b. of this permit.

e. The permittee shall submit a written progress report to EPD on June 30th and December 31st every year describing the status of achieving compliance with Part I.A.1.b., A.2.b., and A.3.b. of this permit. The permittee shall submit the report to the EPD assigned Compliance Office.

2. No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

C. Biomonitoring and Toxicity Reduction Requirements

1. The permittee shall comply with effluent standards or prohibitions established by section 307(a) of the Federal Act and with chapter 391-3-6-.03(5)(e) of the State Rules and may not discharge toxic pollutants in concentrations or combinations that are harmful to humans, animals, or aquatic life.

If toxicity is suspected in the effluent, EPD may require the permittee to perform any of the following actions:

a. Acute biomonitoring tests;

b. Chronic biomonitoring tests;

c. Stream studies;

d. Priority pollutant analyses;

e. Toxicity reduction evaluations (TRE); or

f. Any other appropriate study.

2. EPD will specify the requirements and methodologies for performing any of these tests or studies. Unless other concentrations are specified by EPD, the critical concentration used to determine toxicity in biomonitoring tests will be the effluent instream wastewater concentration (IWC) based on the representative plant flow of the facility and the critical low flow of the receiving stream (7Q10). The endpoints that will be reported are the effluent concentration that is lethal to 50% of the test organisms (LC50) if the test is for acute toxicity, and the no observed effect concentration (NOEC) of effluent if the test is for chronic toxicity.

The permittee must eliminate effluent toxicity and supply EPD with data and evidence to confirm toxicity elimination.

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

The Georgia Environmental Protection Division proposes to issue an NPDES permit to the applicant identified below. The draft permit places conditions on the discharge of pollutants from the wastewater treatment plant to waters of the State.

Technical Contact: Shante Bailey (*Shante.Bailey@dnr.ga.gov)*
404-463-2163

Draft permit:

- ☐ First issuance
- ☐ Reissuance with no or minor modifications from previous permit
- ☒ Reissuance with substantial modifications from previous permit
- ☐ Modification of existing permit
- ☒ Requires EPA review
- ☐ Designated as a major facility

1 FACILITY INFORMATION

1.1 NPDES Permit No.: GA0046582

1.2 Name and Address of Owner/Applicant

SNF Holding Company
P.O Box 250
Riceboro, GA 31323

1.3 Name and Address of Facility

SNF-Riceboro
1 Chemical Plant Rd
Riceboro, GA 31323
(Liberty County)

1.4 Location and Description of the discharge (as reported by applicant)

Outfall ID	Latitude	Longitude	Receiving Waterbody
002	31° 26' 37.65" N (31.743870)	81° 15' 19.38" W (-81.431620)	Riceboro Creek
003	31° 26' 38.58" N (31.744540)	81° 15' 5.77" W (-81.437620)	Riceboro Creek

1.5 Production Capacity

Not applicable

1.6 SIC Code & Description

2869 - Industrial Organic Chemicals, Not Elsewhere Classified
2899 - Chemicals and Chemical Preparations, Not Elsewhere Classified

1.7 Description of Industrial Processes

The facility is an organic polymer production facility. Alcohols and esters are used to produce dry polymers, emulsion polymers, and solution polymers. Principal intermediate products include quarternary monomers and acrylamide monomers. Coproducts include methanol. Other raw materials include maleic anhydride, methyl methacrylate, acetone, dimethyl sulfate, methyl chloride, acrylic acid, sodium hydroxide, dimethyl amine, formaldehyde, acrylonitrile, emulsifiers, surfactants, and catalysts.

1.8 Description of the Wastewater Treatment Facility

Outfall	Operation Description	Treatment Description
002	Miscellaneous utility water, stormwater, Blowdown from thermal oxidizer scrubber	Oil-water separator, grit collector, pH adjustment, aerated 300,000 gal storage tank (store, test, release)
003	Miscellaneous utility water, stormwater	Vortex grit collector, 20,000 storage aerated capture tank, pH adjustment, 20,000 offline storage tank

1.9 Type of Wastewater Discharge

☒ process wastewater ☒ stormwater

☐ domestic wastewater ☐ combined

☒ other (scrubber wastewater, cooling tower and boiler blowdown, pump seal water)

The process wastewater regulated by the ELGs at 40 CFR 414 is discharged under pretreatment permit number GAP050246 to the City of Riceboro Water Pollution Control Plant.

1.10 Characterization of Effluent Discharge as Reported by Applicant
(Form 2C, Section V, Part A only. Please refer to the application for additional analysis)

1.10.1 Outfall No. 002 - Misc utility water, thermal oxidizer scrubber blowdown, and storm water.

Effluent Characteristics (as Reported by Applicant)	Maximum Daily Value	Average Daily Value
Flow (MGD)	0.185	0.129
Biochemical Oxygen Demand,$_{5\text{-day}}$ (mg/L)	99.2	16.8
Total Suspended Solids (mg/L)	10	Not Provided
Temperature, Winter (°F)	72.39	68.88
Temperature, Summer (°F)	89.99	86.27
Ammonia (mg/L)	1.14	0.19
Total Phosphorus (mg/L)	0.149	Not Provided

1.10.2 Outfall No. 002A – Thermal oxidizer scrubber blowdown.[1]

Effluent Characteristics (as Reported by Applicant)	Maximum Daily Value	Average Daily Value
Flow (MGD)	0.164	0.101
Biochemical Oxygen Demand,5-day (mg/L)	63	8
Total Suspended Solids (mg/L)	38	4.2
Temperature, Winter (°F)	99.32	Not Provided
Temperature, Summer (°F)	104.36	Not Provided
Ammonia (mg/L)	ND	Not Provided
Total Phosphorus (mg/L)	Not Provided	Not Provided

[1] Outfall 002A was included in the previous permit but internal monitoring is no longer required as the effluent is not subject to the ELGs at 40 CFR 414.

1.10.3 Outfall No. 003 - Miscellaneous utility water and stormwater

Effluent Characteristics (as Reported by Applicant)	Maximum Daily Value	Average Daily Value
Flow (MGD)	0.25	0.045
Biochemical Oxygen Demand,5-day (mg/L)	83.6	16.5
Total Suspended Solids (mg/L)	37.5	Not Provided
Temperature, Winter (°F)	73.58	67.82
Temperature, Summer (°F)	89.96	85.1
Ammonia (mg/L)	13.1	1.01
Total Phosphorus (mg/L)	0.166	Not Provided

2 APPLICABLE REGULATIONS

2.1 State Regulations

Chapter 391-3-6 of the Georgia Rules and Regulations for Water Quality Control

2.2 Federal Regulations

Source	Activity	Applicable Regulation
Industrial (Non-POTW)	Non-Process Water Discharges	40 CFR 122 40 CFR 125 40 CFR 127 40 CFR 136
	Process Water Discharges	40 CFR 122 40 CFR 125 40 CFR 127 40 CFR 136

2.3 Industrial Effluent Limit Guideline(s)

ELGs associated with 40 CFR 414 are no longer applicable as no process wastewater is discharged to Outfalls 002 or 003 from the Acrylates or Acrylamide Plants. The Acrylates and Acrylamide Plants wastewater discharges are processed in the wastewater treatment plant that discharges to the City of Riceboro.

3 WATER QUALITY STANDARDS & RECEIVING WATERBODY INFORMATION

Section 301(b)(1)(C) of the Clean Water Act (CWA) requires the development of limitations in permits necessary to meet water quality standards. Federal Regulations 40 CFR 122.4(d) require that conditions in NPDES permits ensure compliance with the water quality standards which are composed of use classifications, numeric and or narrative water quality criteria and an antidegradation policy. The use classification system designates the beneficial uses that each waterbody is expected to achieve, such as drinking water, fishing, or recreation. The numeric and narrative water quality criteria are deemed necessary to support the beneficial use classification for each water body. The antidegradation policy represents an approach to maintain and to protect various levels of water quality and uses.

3.1 Receiving Waterbody Classification and Information

Designated Water Use: The designated water use for the Riceboro Creek is fishing.

[391-3-6-.03(6)]

Fishing

(i) Dissolved Oxygen: A daily average of 6.0 mg/L and no less than 5.0 mg/L at all times for water designated as trout streams by the Wildlife Resources Division. A daily average of 5.0 mg/L and no less than 4.0 mg/L at all times for waters supporting warm water species of fish.

(ii) pH: Within the range of 6.0 - 8.5.

(iii) Bacteria:

1. For the months of May through October, when water contact recreation activities are expected to occur, fecal coliform not to exceed a geometric mean of 200 per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. Should water quality and sanitary studies show fecal coliform levels from non-human sources exceed 200/100 mL (geometric mean) occasionally, then the allowable geometric mean fecal coliform shall not exceed 300 per 100 mL in lakes and reservoirs and 500 per 100 mL in free flowing freshwater streams. For the months of November through April, fecal coliform not to exceed a geometric mean of 1,000 per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours and not to exceed a maximum of 4,000 per 100 mL for any sample. The State does not encourage swimming in these surface waters since a number of factors which are beyond the control of any State regulatory agency contribute to elevated levels of bacteria.

2. For waters designated as shellfish growing areas by the Georgia DNR Coastal Resources Division, the requirements will be consistent with those established by the State and Federal agencies responsible for the National Shellfish Sanitation Program. The requirements are found in National Shellfish Sanitation Program Guide for the Control of Molluscan Shellfish, 2007 Revision (or most recent version), Interstate Shellfish Sanitation Conference, U.S. Food and Drug Administration.

(iv) Temperature: Not to exceed 90°F. At no time is the temperature of the receiving waters to be increased more than 5°F above intake temperature except that in estuarine waters the increase will not be more than 1.5°F. In streams designated as primary trout or smallmouth bass waters by the Wildlife Resources Division, there shall be no elevation of natural stream temperatures. In streams designated as secondary trout waters, there shall be no elevation exceeding 2°F natural stream temperatures.

3.2 Ambient Information

Outfall ID	7Q10 (cfs)	1Q10 (cfs)	Hardness (mg/L as $CaCO_3$)	Annual Average Flow (cfs)	Upstream Total Suspended Solids (mg/L)
002	Tidal	Tidal	3,022	Tidal	N/A[1]
003	Tidal	Tidal	3,022	Tidal	N/A[1]

[1] [2] For the Reasonable Potential Analysis calculations, EPD used 10 mg/l as a conservative value.

3.3 Georgia 305(b)/303(d) List Documents

Riceboro Creek is not listed.

3.4 Total Maximum Daily Load (TMDL)

There is no applicable TMDL for Riceboro Creek.

3.5 Wasteload Allocation Date

September 22, 2021

See Appendix A of the Fact Sheet

4 PERMIT CONDITIONS AND EFFLUENT LIMITATIONS

4.1 Water Quality Based Effluent Limitations (WQBELs) & Technology Based Effluent Limits (TBELS)

When drafting a National Pollutant Discharge Elimination System (NPDES) permit, a permit writer must consider the impact of the proposed pollutants in a discharge on the quality of the receiving water. Water quality goals for a waterbody are defined by state water quality criteria or standards. By analyzing the effect of a pollutant in the discharge on the receiving water, a permit writer could find that technology-based effluent limitations (TBELs) alone will not achieve the applicable water quality standards or protect downstream users. In such cases, the Clean Water Act (CWA) and its implementing regulations require development of water quality-based effluent limitations (WQBELs). WQBELs help meet the CWA objective of restoring and maintaining the chemical, physical, and biological integrity of the nation's waters and the goal of water quality that provides for the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water (fishable/swimmable).

WQBELs are designed to protect water quality by ensuring water quality standards are met in the receiving water and the designated use and downstream uses are protected. On the basis of the requirements of 40 C.F.R §125.3(a), additional or more stringent effluent

limitations and conditions, such as WQBELs, are imposed when TBELs are not sufficient to protect water quality.

TBELs aim to prevent pollution by requiring a minimum level of effluent quality that is attainable using demonstrated technologies for reducing discharges of pollutants or pollution into the waters of the State. TBELs are developed independently of the potential impact of a discharge on the receiving water, which is addressed through water quality standards and WQBELs. The NPDES regulations at 40 C.F.R. §125.3(a) require NPDES permit writers to develop technology-based treatment requirements, consistent with CWA section 301(b), that represent the minimum level of control that must be imposed in a permit. The regulation also requires permit writers to include in permits additional or more stringent effluent limitations and conditions, including those necessary to protect water quality.

For pollutants not specifically regulated by Federal Effluent Limit Guidelines (ELGS), the permit writer must identify any needed TBELS and utilize best professional judgment to establish TBELS or determine other appropriate means to control its discharge if there is a reasonable potential to cause or contribute to a violation of the water quality standards.

4.2 Reasonable Potential Analysis (RPA)

EPA regulations at 40 C.F.R. §122.44(d)(1)(i) state, "Limitations must control all pollutants or pollutant parameters (either conventional, nonconventional, or toxic pollutants) which the Director determines are or may be discharged at a level that will *cause*, have the *reasonable potential to cause*, or *contribute* to an excursion above any [s]tate water quality standard, including [s]tate narrative criteria for water quality." [emphasis added]

EPA regulations at 40 C.F.R. §122.44(d)(1)(ii) require States to develop procedures for determining whether a discharge causes, has the reasonable potential to cause, or contributes to an instream excursion above a narrative or numeric criterion within a state water. If such reasonable potential is determined to exist, the NPDES permit must contain pollutant effluent limits and/or effluent limits for whole effluent toxicity. Georgia has reasonable potential procedures, based upon the specific category of pollutants and/or specific pollutant of concern. Chemical specific and biomonitoring data and other pertinent information in EPD's files will be considered in accordance with the review procedures specified in the GA Rules and Regulations for Water Quality Control, Chapter 391-3-6 in the evaluation of a permit application and in the evaluation of the reasonable potential for a discharge to cause an exceedance in the numeric or narrative criteria.

The term "pollutant" is defined in CWA section 502(6) and 40 C.F.R. §122.2. Pollutants are grouped into three categories under the NPDES program: conventional, toxic, and nonconventional. Conventional pollutants are those defined in CWA section 304(a)(4) and 40 C.F.R.§401.16 (five day-biochemical oxygen demand (BOD_5), total suspended solids (TSS), fecal coliform, pH, and oil and grease). Toxic (priority) pollutants are those defined in CWA section 307(a)(1) and include 126 metals and manmade organic compounds. Nonconventional pollutants are those that do not fall under either of the above categories (conventional or toxic pollutants) and include parameters such as, but not limited to, chlorine,

ammonia, nitrogen, phosphorus, chemical oxygen demand (COD), and whole effluent toxicity (WET).

EPD evaluates the data provided in the application and supporting documents. If a pollutant is listed in the following sections of this fact sheet below, the permit writer determined the pollutant is a pollutant of concern and there may be a reasonable potential to cause or contribute to an instream violation of the Georgia water quality standards. If a pollutant is not listed below, EPD determined the pollutant is not a pollutant of concern or has determined, based on the data provided in the application, there is no reasonable potential to cause or contribute to an instream violation of the Georgia water quality standards. An example may be if the applicant reported "not detect" or "below detection limit".

Upon identification of a pollutant of concern by the permit writer, in accordance with 40 C.F.R. §122.44(d)(1)(ii), the permit writer must then perform a reasonable potential analysis using a procedure which has accounted for any combination of the following criteria: existing controls on point and nonpoint sources of pollution, the variability of the pollutant or pollutant parameter in the effluent, the sensitivity of the species to toxicity testing (when evaluating whole effluent toxicity), and where appropriate, the dilution of the effluent in the receiving water to determine if the pollutant and its discharge has the reasonable potential to cause, or contribute to an in-stream excursion above the allowable ambient concentration of a state narrative or numeric criteria within the state's water quality standard for an individual pollutant.

In accordance with 40 C.F.R. §122.44(d)(1)(iii), if the permit writer has determined, using a reasonable potential procedure the pollutant of concern in the discharge causes, has the reasonable potential to cause, or contributes to an in-stream excursion above the allowable ambient concentration of a state numeric or narrative criteria within a state water quality standard for an individual pollutant, the permit must contain effluent limits for that pollutant. If the permit writer has determined there is insufficient data, the permit writer might also consider monitoring requirements to collect the additional data related to the presence or absence of a specific pollutant to provide information for further analyses for the development of appropriate numeric or narrative standard .

The conventional, nonconventional, and toxic pollutants listed in the following sections have been identified by the permit writer as pollutants of concern and the permit writer has determined through current practices and procedures one of the following: no additional monitoring or numeric and/or narrative effluent limits are needed; additional monitoring is required; or numeric and/or narrative effluent limits are necessary to protect the receiving water body and its downstream users and those limits have been included in the permit.

The monitoring and sampling locations are prescribed in the permit and determined by the permit writer after considering, at a minimum, the following: type of discharge, specific pollutant, discharge frequency, location of the discharge, receiving waterbody, downstream users, etc.

The sample type, grab vs. composite, is prescribed in the permit and determined by the permit writer after considering, at a minimum, the analytical method required in 40 C.F.R. §136,

the type of pollutant, retention time, etc. Grab samples are required for the analysis of pH, temperature, cyanide, total phenols, residual chlorine, oil and grease, fecal coliform (including *E. coli*), or volatile organics.

4.3 Whole Effluent Toxicity

The permittee shall comply with effluent standards or prohibitions established by section 307(a) of the Federal Act and with chapter 391-3-6-.03(5)(e) of the State Rules and may not discharge toxic pollutants in concentrations or combinations that are harmful to humans, animals, or aquatic life.

If toxicity is suspected in the effluent, EPD may require the permittee to perform acute or chronic whole effluent toxicity testing.

Chronic WET test measures the effect of wastewater on indicator organisms' growth, reproduction and survival.

Chronic testing for Ceriodaphnia dubia and Pimephales promelas was conducted in March 2016 and August 2016.

Results of the August 2016 aquatic biomonitoring tests indicated a statistically significant effect on survival and reproduction for *C. dubia* at the 12.5%, 25%, 50% and 100% effluent concentrations. The results for *P. promelas* indicated a statistically significant effect to weight and/or survival at the 100% effluent concentration.

In accordance with *EPD's Whole Effluent Toxicity (WET) Strategy (2001)*, chronic WET testing will be required at Outfall 002 and 003 once during the permit term at the IWC of 1.4%.

4.4 Conventional Pollutants

Pollutants of Concern	Outfall ID	Basis
pH	002, 003	<u>WQBEL</u> The instream waste concentration provided in the WLA is 1.4%. When the instream waste concentration is below 50%, there is no reasonable potential to cause or contribute to a violation of the instream Georgia Water Quality Standard therefore a limit of 6.0 s.u. to 9.0 s.u has been retained from the previous permit. <u>TBEL</u> There is no applicable federal technology based effluent limit.

5-Day Carbonaceous Biochemical Oxygen Demand ($CBOD_5$)	002 & 003 combined	<u>WQBEL</u> Per the Wasteload Allocation, a mass based daily average of 220.3 lbs/day and a calculated daily max of 330.5 lbs/day which is 1.5 times the daily average has been included in the permit for the sum of outfalls 002 and 003 during the months of November-April. A mass based daily average of 49.0 lbs/day and a calculated daily max of 73.5 lbs/day which is 1.5 times the daily average has been included in the permit permit for the sum of outfalls 002 and 003 during the months of May-October. The water quality modeling done for the wasteload allocation was run based on natural conditions (natural dissolved oxygen (DO)) in the system is less than a daily average DO of 5.0 mg/L and WLA conditions based on discharges from SNF Holding Company and Interstate Paper LLC dba DS Smith Riceboro Mill (GA0003590). With the WLA model runs, the effluent BOD5, ammonia, and DO loads were adjusted to elevate the DO deficits attributable to SNF and the Riceboro Mill. The water quality model indicated that an effluent D.O. of 3.5 mg/L from this facility would allow the receiving waterbody to meet the allowable instream DO deficit for coastal streams. <u>TBEL</u> There is no applicable federal technology based effluent limit.

Dissolved Oxygen (DO)	002, 003	WQBEL Per the wasteload allocation, a daily minimum of 3.5 mg/L has been included in the permit for each outfall. The water quality modeling done for the wasteload allocation was run based on natural conditions (natural DO in the system is less than a daily average DO of 5.0 mg/L) and WLA conditions based on discharges from SNF Holdings Company and Interstate Paper LLC dba DS Smith Riceboro Mill (GA0003590). With the WLA model runs, the effluent BOD5, ammonia, and DO loads were adjusted to elevate the DO deficits attributable to SNF and the Riceboro mill. The water quality model indicated that an effluent D.O. of 3.5 mg/L from this facility would allow the receiving waterbody to meet the allowable instream DO deficit for coastal streams. TBEL There is no applicable federal technology based effluent limit.

4.5 Nonconventional Pollutants

Pollutants of Concern	Outfall ID	Basis
Ammonia, as N	002 & 003 combined	WQBEL Per the Wasteload Allocation, a mass based daily average of 17.2 lbs/day and a calculated daily max of 25.8 lbs/day which is 1.5 times the daily average has been included in the permit for the sum of outfalls 002 and 003 during the months of November-April. A mass based daily average of 1.1 lbs/day and a calculated daily max of 1.7 lbs/day which is 1.5 times the daily average has been included in the permit permit for the sum of outfalls 002 and 003 during the months of May-October. TBEL There is no applicable federal technology based effluent limit.

Total Residual Chlorine (TRC)	002	WQBEL A daily maximum TRC limit of 0.5 mg/L has been determined using the US EPA's chronic TRC criterion of 11 µg/L in the receiving stream after dilution. Since the calculated TRC limit is greater than 0.5 mg/L, a daily maximum limit of 0.5 mg/L will be included in the permit. Refer to Section 4.7.b below for calculations.
		TBEL There is no applicable federal technology based effluent limit.
	003	WQBEL Based on the data submitted in the application TRC has not been identified as a pollutant of concern and effluent limits and monitoring are not required for outfall 003.
		TBEL There is no applicable federal technology based effluent limit.
Temperature	002, 003	WQBEL The water quality standards and specific criteria for temperate in the estuarine receiving waterbody are provided in Chapter 391-3-6-.03(6)(c)(iv) the Rules. Based on the data provided in the permit application (see Sections 1.10.2 and 1.10.3 of the fact sheet), temperature continues to be identified as a pollutant of concern and EPD believes there is a reasonable potential to cause or contribute to a violation of the instream water quality standard and criteria for temperature at this time. Additionally, the existing temperature limits in the permit must be maintained to comply with the antibacksliding requirements of the Clean Water Act Section 402 (o) which states a permit may not be renewed, reissued, or modified to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit. Thus the temperature limitations in the draft permit of 90 degree °F and an instream +Δ1.5 °F temperature differential are retained from the previous permit.
		TBEL There is no applicable federal technology based effluent limit.

Total Kjeldahl Nitrogen, Organic Nitrogen, Nitrate/Nitrite	002, 003	WQBEL Per "*Georgia's Plan for the Adoption of Water Quality Standards for Nutrients*" (2013) as amended, EPD is working to develop water quality models throughout the State of Georgia. EPD is requiring all point source discharges with the presence of ammonia to monitor for total Kjeldahl nitrogen, organic nitrogen, and nitrate/nitrite and to develop these models. TBEL There is no applicable federal technology based effluent limit.
Total Phosphorus	002 & 003 combined	WQBEL Per the Wasteload Allocation, a mass based daily average of 13.3 lbs/day and a calculated daily max of 20.0 lbs/day which is 1.5 times the daily average has been included in the permit for the sum of outfalls 002 and 003 during the months of November-April. A mass based daily average of 4.4 lbs/day and a calculated daily max of 6.6 lbs/day which is 1.5 times the daily average has been included in the permit permit for the sum of outfalls 002 and 003 during the months of May-October. TBEL There is no applicable federal technology based effluent limit.
Orthophosphate, as P	002,003	WQBEL Per the *Strategy for Addressing Phosphorus in NPDES Permitting* (2011) all routine permit reissuances that have discharges upstream from reservoirs, lakes, impoundments, and/or estuaries must include orthophosphate monitoring. SNF's discharges upstream of the North Newport River which is a tidal estuarine system, hence orthophosphate monitoring has been added to the permit. TBEL There is no applicable federal technology based effluent limit.

4.6 Toxics & Manmade Organic Compounds (126 priority pollutants and metals)

Pollutants of Concern	Outfall ID	Basis
Acrylamide	002	WQBEL In accordance with the antibacksliding requirements of the Clean Water Act section 402 (o) which states a permit may not be renewed, reissued, or modified to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit; the 55 mg/L daily maximum limit from the previous permit has been retained. TBEL There is no applicable federal technology based effluent limit.

4.7 Calculations for Water Quality Based Effluent Limits

4.7.1 Carbonaceous Biochemical Oxygen Demand (5-day)

Effluent Limits are based on the results of the coupled hydrodynamic and water quality model EFDC for the North Newport River provided in the Wasteload Allocation dated September 22, 2021.

Outfalls 002 and 003

May-October

Daily Average = 220.3 lbs/day
Daily Maximum = 1.5 x Daily Average (lbs/day)
Daily Maximum = 1.5 x 220.3 (lbs/day)
Daily Maximum = 330.5 (lbs/day)

November-April

Daily Average = 49.0lbs/day
Daily Maximum = 1.5 x Daily Average (lbs/day)
Daily Maximum = 1.5 x 49.0(lbs/day)
Daily Maximum = 73.5 (lbs/day)

4.7.2 Total Residual Chlorine

The analysis for total residual chlorine is based on EPD's 2003 Reasonable Potential Guidance Document and *Total Residual Chlorine (TRC) Strategy* (2010).

Outfall No. 002

$$Instream\ Criteria = 11\frac{\mu g}{L}$$

$$Dilution\ Factor = 72.75$$

$$Instream\ Concentration = \frac{Effluent\ TRC\ Concentration}{Dilution\ Factor}$$

$$Instream\ Concentration = \frac{1030\ \frac{\mu g}{L}}{72.75}$$

$$Instream\ Concentration = 14.16\ \frac{\mu g}{L}$$

$$\%\ of\ Instream\ Criteria = \frac{Instream\ Concentration\ \times 100}{Instream\ Criteria}$$

$$\%\ of\ Instream\ Criteria = \frac{14.15\ \frac{\mu g}{L} \times 100}{11\frac{\mu g}{L}}$$

$$\%\ of\ Instream\ Criteria = 128.71\% > 100\%$$

There is a reasonable potential for total residual chlorine to cause or contribute to a violation of in-stream water quality criteria. A limit will be included in Outfall 002 in accordance with the following calculations:

$$Effluent\ Limit = Dilution\ Factor \times\ Instream\ Criteria$$

$$Effluent\ Limit =\ 72.75\ \times 0.011\frac{mg}{L}$$

$$Effluent\ Limit = 0.79\frac{mg}{L}$$

Based upon the *Total Residual Chlorine Strategy* (2010) a limit of 0.5 mg/L will be added for Outfall 002.

4.8 Technology Based Effluent Limitation Calculations

There are several ways to calculate TBELs when developing case-by-case limitations. EPD can use an approach consistent with the statistical approach EPA has used to develop effluent guidelines or they can utilize several other mathematically and statistically accepted approaches depending on characteristics of the data. In general, EPD utilizes EPA's "NPDES Permit Writer Manual," September 2010, Section 5.2.3, "Case-by-Case TBELs for Industrial Dischargers" and EPA's "Technical Support Document for Water Quality Based Toxic Control," March 1991, Section 5.2, "Basis Principles of Effluent Variability," as guidance to develop limits.

If applicable, when there is no federal technology based effluent limit EPD evaluates the effluent data, operating records and discharge monitoring reports to calculate the long term average for the parameter. The long term average is then used to derive the effluent limits.

EPD recognizes there are several ways to calculate technology based limits and, when applicable, may deviate from the general practice.

4.9 Comparison & Summary of Water Quality vs. Technology Based Effluent Limits

After preparing and evaluating applicable technology-based effluent limitations and water quality-based effluent limitations, the most stringent limits are applied in the permit. Pollutants of concern with an effluent limit of monitor and report are not included in the below table.

Sum of Outfall 002 and 003:

Parameter	WQBELs	TBELs	Explanation
$CBOD_5$ (lbs/day) November-April	220.3/330.5	None	WQBEL – WLA
$CBOD_5$ (lbs/day) May-October	49.0/73.5	None	WQBEL – WLA
Ammonia (lbs/day) November-April	17.2/25.8	None	WQBEL – WLA
Ammonia (lbs/day) May-October	1.1/1.7	None	WQBEL – WLA
Total Phosphorus (lbs/day) November-April	13.3/20.0	None	WQBEL – WLA
Total Phosphorus (lbs/day) May-October	4.4/6.6	None	WQBEL – WLA

Outfall 002:

Parameter	WQBELs	TBELs	Explanation
pH (s.u.)	6.0 – 9.0	6.0 – 9.0	WQBEL – WQS
Dissolved Oxygen (mg/l) Daily Minimum	3.5	None	WQBEL – WLA
Temperature (°F) Daily Maximum	90	None	WQBEL – RPA
Temperature Differential (ΔF) Daily Maximum	Δ1.5	None	WQBEL – RPA
Acrylamide (mg/L)	55/55	None	WQBEL – Anti-backsliding
Total Residual Chlorine (mg/L) Daily Maximum	0.5	None	WQBEL – TRC Strategy

Outfall 002A:

The internal limits have been removed as the ELGs at 40 CFR 414 are no longer applicable to the discharge.

Outfall 003:

Parameter	WQBELs	TBELs	Explanation
pH (s.u.)	6.0 – 9.0	6.0 – 9.0	WQBEL – WLA
Dissolved Oxygen (mg/L) Daily minimum	3.5	None	WQBEL – WLA
Temperature (°F) Daily Maximum	90	None	WQBEL – RPA
Temperature Differential (ΔF) Daily Maximum	Δ1.5	None	WQBEL – RPA

5 OTHER PERMIT REQUIREMENTS AND CONSIDERATIONS

5.1 Compliance Schedules

The facility has requested a schedule of compliance for $CBOD_5$, dissolved oxygen, ammonia, total phosphorus, and total residual chlorine in order to implement physical changes to segretate industrial stormwater discharges and divert industrial stormwater to separate stormwater-only outfalls. The facility has proposed a 60 month schedule which includes the following milestones:

- Within 9 months of the NPDES Permit effective date, perform applicable studies to identify process wastewater discharges to Outfalls 002 and 003 and identify options for rerouting storm water only flows.

- Within 18 months of the NPDES Permit effective date, develop a conceptual design for project/budget approval for segregating process wastewater from industrial storm water discharges flowing to Outfalls 002 and 003.

- Within 24 months of NPDES Permit effective date, develop the detailed design and provide budgeting for new systems required for segregation of industrial stormwater discharges and diversion to separate industrial stormwater only outfalls.

- Within 30 months of NPDES Permit effective date, begin construction of systems needed for segregation of industrial stormwater discharges and diversion to separate industrial stormwater only outfalls.

- Within 42 months of NPDES Permit effective date, complete segregation of the main process wastewater flows (cooling tower and boiler blowdown and thermal oxidizer scrubber blowdown) from storm water flowing to Outfalls 002 and 003.

- Within 42 months of NPDES Permit effective date, begin monitoring for additional unidentified non-allowable non-storm water flows. Begin monitoring activities to identify characteristics for pollutants of concern in storm water (e.g., applicable benchmarks included in the new IGP anticipated to be issued in mid- 2022). Continue monitoring of process wastewater flows to identify characteristics for pollutants of concern in process wastewater.

- Within 48 months of NPDES Permit effective date, complete review and selection of applicable best management practices (BMPs), which may include treatment systems for storm water, to meet applicable benchmarks included in the new IGP anticipated to be issued in mid-2022.

- Within 48 months of NPDES Permit effective date, complete review and selection of process wastewater treatment systems to meet NPDES process wastewater only discharge limits (e.g., total residual chlorine (TRC), DO).

- Within 60 months of the NPDES Permit effective date, complete construction of new systems and implementation of procedures for segregation of industrial stormwater discharges and diversion to separate industrial stormwater only outfalls.

- Within 60 months of the NPDES Permit effective date, complete construction of new systems and implementation of procedures necessary to meet process wastewater only discharge limits.

- Within 60 months of the NPDES Permit effective date secure coverage under the IGP for any new industrial stormwater only outfalls and update the Facility's Stormwater Pollution Prevention Plan (SWPPP) to address changes in industrial stormwater collection, treatment, and discharge systems as well as any change in stormwater pollution prevention practices and procedures.

5.2 Anti-Backsliding

The limits in this permit are in compliance with the 40 C.F.R. 122.44(l), which requires a reissued permit to be as stringent as the previous permit. 40 C.F.R. 122.44(l)(2)(i)(B)(1) states, permit limits may be less stringent if "Information is available which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and which would have justified the application of a less stringent effluent limitation at the time of permit reissuance".

The draft permit has removed the TBELs from the federal regulations at 40 CFR 414, Organic Chemicals, Plastics, and Synthetic Fibers, for Outfall 002A as they no longer apply. The process wastewater that originates from the facility's acrylates or acrylamide plants is treated before being discharged to the City of Riceboro Water Pollution Control Plant under pretreatment permit GAP050246. No process wastewater from the acrylate and acrylamide plant is discharged to outfalls 002, 003, or internal outfall 002A. The discharges from outfall 002 and 003 (miscellaneous utility water, thermal oxidizer scrubber blowdown, and storm water runoff) do not have applicable federal effluent limitation guidelines.

6 REPORTING

The facility has been assigned to the following EPD office for reporting, compliance and enforcement.

Environmental Protection Division
Coastal District Office
400 Commerce Center Drive
Brunswick, Georgia 31523-8251

6.1 E-Reporting

The permittee is required to electronically submit documents in accordance with 40 CFR Part 127.

7 REQUESTED VARIANCES OR ALTERNATIVES TO REQUIRED STANDARDS

Not applicable

8 PERMIT EXPIRATION

The permit will expire five years from the effective date.

9 PROCEDURES FOR THE FORMULATION OF FINAL DETERMINATIONS

9.1 Comment Period

The Georgia Environmental Protection Division (EPD) proposes to issue a permit to this applicant subject to the effluent limitations and special conditions outlined above. These determinations are tentative.

Georgia Environmental Protection Division
Wastewater Regulatory Program
2 Martin Luther King Jr. Drive
Suite 1152 East
Atlanta, Georgia 30334

The permit application, draft permit, and other information are available for review at 2 Martin Luther King Jr. Drive, Suite 1152 East, Atlanta, Georgia 30334, between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday and on EPD's website accessible through the publicly available Georgia EPD Online System (GEOS) at: https://geos.epd.georgia.gov/GA/GEOS/Public/GovEnt/Shared/Pages/Main/Login.aspx. For additional information, you can contact 404-463-1511.

9.2 Public Comments

Persons wishing to comment upon or object to the proposed determinations are invited to submit same in writing to the EPD address above, or via e-mail at *EPDcomments@dnr.ga.gov* within 30 days of the initiation of the public comment period. All comments received prior to that date will be considered in the formulation of final determinations regarding the application. The permit number should be placed on the top of the first page of comments to ensure that your comments will be forwarded to the appropriate staff.

9.3 Public Hearing

Any applicant, affected state or interstate agency, the Regional Administrator of the U.S. Environmental Protection Agency (EPA) or any other interested agency, person or group of persons may request a public hearing with respect to an NPDES permit application if such request is filed within thirty (30) days following the date of the public notice for such application. Such request must indicate the interest of the party filing the request, the reasons why a hearing is requested, and those specific portions of the application or other NPDES form or information to be considered at the public hearing.

The Director shall hold a hearing if he determines that there is sufficient public interest in holding such a hearing. If a public hearing is held, notice of same shall be provided at least thirty (30) days in advance of the hearing date.

In the event that a public hearing is held, both oral and written comments will be accepted; however, for the accuracy of the record, written comments are encouraged. The Director or a designee reserves the right to fix reasonable limits on the time allowed for oral statements and such other procedural requirements, as deemed appropriate.

Following a public hearing, the Director, unless it is decided to deny the permit, may make such modifications in the terms and conditions of the proposed permit as may be appropriate and shall issue the permit.

If no public hearing is held, and, after review of the written comments received, the Director determines that a permit should be issued and that the determinations as set forth in the proposed permit are substantially unchanged, the permit will be issued and will become final in the absence of a request for a contested hearing. Notice of issuance or denial will be made available to all interested persons and those persons that submitted written comments to the Director on the proposed permit.

If no public hearing is held, but the Director determines, after a review of the written comments received, that a permit should be issued but that substantial changes in the proposed permit are warranted, public notice of the revised determinations will be given and written comments accepted in the same manner as the initial notice of application was given and written comments accepted pursuant to EPD Rules, Water Quality Control, subparagraph 391-3-6-.06(7)(b). The Director shall provide an opportunity for public hearing on the revised determinations. Such opportunity for public hearing and the issuance or denial of a permit thereafter shall be in accordance with the procedures as are set forth above.

9.4 Final Determination

At the time that any final permit decision is made, the Director shall issue a response to comments. The issued permit and responses to comments can be found at the following address:

http://epd.georgia.gov/watershed-protection-branch-permit-and-public-comments-clearinghouse-0

9.5 Contested Hearings

Any person who is aggrieved or adversely affected by the issuance or denial of a permit by the Director of EPD may petition the Director for a hearing if such petition is filed in the office of the Director within thirty (30) days from the date of notice of such permit issuance or denial. Such hearing shall be held in accordance with the EPD Rules, Water Quality Control, subparagraph 391-3-6-.01.

Petitions for a contested hearing must include the following:

1. The name and address of the petitioner;
2. The grounds under which petitioner alleges to be aggrieved or adversely affected by the issuance or denial of a permit;
3. The reason or reasons why petitioner takes issue with the action of the Director;
4. All other matters asserted by petitioner which are relevant to the action in question.

APPENDIX A
Wasteload Allocation

National Pollutant Discharge Elimination System
Wasteload Allocation Form

Part I: Background Information

WLA Request Type: Reissuance ☒ Expansion ☐ Relocation ☐ New Discharge ☐

Facility Name: **SNF Holding Company, Inc.** County: **Liberty** WQMU: **0213**

NPDES Permit No.: **GA0046582** Expiration Date: **August 31, 2020** Outfall Number: **002 & 003**

Receiving Water: **Riceboro Creek** River Basin: **Ogeechee** 10-Digit HUC: **0306020403**

Discharge Type: Domestic ☐ Industrial ☒ Both ☐ Proportion (D:I): Flow(s) Requested (MGD): **0.3**

Ecoregion: **75j – Sea Islands/Coastal Marsh**

Industrial Contributions Type(s): **Organic polymer**

Treatment Process Description: **Wastewater from the scrubber system is treated by thermal oxidation**

Additional Information: (history, special conditions, other facilities): **Outfall 002 is permitted to discharge wastewater from cooling tower blowdown, boiler blowdown, pump seal water, scrubber water, and stormwater runoff; Outfall 003 is permitted to discharge wastewater from cooling tower blowdown, boiler blowdown, and stormwater runoff. SNF plans to segregate stormwater from process wastewater.**

Requested by: **Whitney Fenwick** Program: **WRP** Date: **7/9/2021**

Part II: Receiving Water Information

Receiving Water: **Riceboro Creek** Designated Use Classification: **Fishing**

Integrated 305(b)/303(d) List: Yes ☒ No ☐ Supporting: ☐ Assessment Pending: ☒ Criteria:

Total Maximum Daily Load: Yes ☐ No ☒ Parameter(s) WLA Complies with TMDL Yes ☐ No ☐

Part III: Water Quality Model Review Information

Model Type: Uncalibrated ☐ Calibrated ☒ Verified ☐ Cannot be Modeled ☐ Model Length (mi):

Field Data: None ☐ Fair ☐ Good ☒ Excellent ☐

Model and Field Data Description: **The Visual EFDC 2.0 was utilized to build and calibrate the coupled hydrodynamic and water quality model EFDC for the North Newport River. The modified EFDC model was used to develop this wasteload allocation.**

Critical Water Temperature:(°C):		Drainage Area (mi²):				Mean annual streamflow at discharge	**Tidal**
7Q10 Yield (cfs/mi²):		Velocity (range fps):				30Q3 streamflow at discharge (cfs):	**Tidal**
Effluent Flow Rate (cfs):	**0.464**	Dilution Factor:	**72.75**	IWC:	**1.4%**	7Q10 streamflow at discharge (cfs):	**Tidal**
Slope (range - fpm):	K1:	K3:		K2:	**0.4**	1Q10 streamflow at discharge (cfs):	**Tidal**
SOD: **0.5 – 0.85**	Escape Coef. (ft^{-1}):	f-Ratio (BOD_u/BOD_5):	**2**				

The predicted DO deficits attributable to the SNF Holding Company discharge meet the DO criteria for coastal streams designated as Fishing.

Part IV: Recommended Permit Limitations and Conditions (mg/L as a daily average except as noted)

Rationale: Same as current ☐ Revised ☒ New ☐

Location: **Outfall 002 (Lat 31°44'37.92"N Long 81°25'53.84"W) Outfall 003 (Lat 31°44'40.50"N Long 81°26'16.05"W)**

Outfall	Month	Flow (MGD)	*$CBOD_5$ (lbs/day)	*NH_3 (lbs/day)	DO (minimum)	pH (SU)	*Total Phosphorus (lbs/day)	Ortho-P	TKN, Nitrate-Nitrite, Organic Nitrogen
002	**November - April**	**Monitor**	**220.3**	**17.2**	**3.5**	**6.0 - 9.0**	**13.3**	**Monitor**	**Monitor**
003	**November - April**	**Monitor**			**3.5**	**6.0 - 9.0**		**Monitor**	**Monitor**
002	**May - October**	**Monitor**	**49.0**	**1.1**	**3.5**	**6.0 - 9.0**	**4.4**	**Monitor**	**Monitor**
003	**May - October**	**Monitor**			**3.5**	**6.0 - 9.0**		**Monitor**	**Monitor**

Additional Comments:

***Mass loading limitations are for outfalls 002 and 003 combined.**

- **Priority pollutant permit limits, effluent toxicity testing requirements, and other parameters required by categorical effluent guidelines or identified during review of permit application are to be determined by WRP.**
- **Effluent monitoring for ortho-p, TKN, nitrate-nitrite, and organic nitrogen is recommended. Total phosphorus and ortho-p should be analyzed from the same effluent sample; TKN, nitrate-nitrite, and NH_3 should be analyzed from the same effluent sample. Organic nitrogen should be calculated as TKN minus NH_3.**

Prepared by: **Larry Guerra** LCG Date: **9/22/2021** Reviewed by: **Josh Welte** Date:

Part V: Program Manager Comments/

Elizabeth Booth Elizabeth A Booth Date: **09/22/2021**

1/8/2021

Georgia Department of Natural Resources
Environmental Protection Division
Atlanta, Georgia

Appendix B
Reasonable Potential Analysis
Outfall 002

COASTAL AND MARINE ESTUARINE

Permit Name: SNFHolding Company **NPDES Permit No.:** GA0046582 outfall 2

Stream Data:

Receiving stream Hardness:	3,022	mg/L
Upstream TSS:	10	mg/L
7Q10:	NA	ft^3/s
	#VALUE!	gal/day
1Q10:	NA	ft^3/s
	#VALUE!	gal/day

Effluent Data:

Flow	222,548	gal/day
TSS	10.00	mg/L
Instream TSS:	10.14	mg/L
Acute Dilution factor:	--	
Chronic Dilution factor:	--	

Water Quality Criteria:

Mean annual streamflow at discharge:	NA	ft^3/s
	#VALUE!	gal/day
Dilution factor:	72.750	
IWC:	1.4	%

Acute Water Quality Criteria (WQC_{Acute})

Metal	K_{eq}	α	f_p	Maximum effluent C_f (µg/L)	Instream C_p (µg/L)	WQC_{Acute} (µg/L)	Action needed?
Arsenic	4.80.E+05	-0.729	0.00	0.00	0.00	69.00	no
Cadmium	4.00.E+06	-1.131	0.000	0.00	0.00	40.00	no
Chromium VI	3.36.E+06	-0.930	0.00	0.00	0.00	1100.00	no
Copper	1.04.E+06	-0.744	0.00	0.00	0.00	4.80	no
Lead	3.10.E+05	-0.186	0.33	3.60	0.02	210.00	no
Mercury	NA	NA	NA	0.0000	0.0000	1.800	no
Nickel	4.90.E+05	-0.572	0.00	0.00	0.00	74.00	no
Selenium	NA	NA	0.998	0.00	0.00	290.000	no
Zinc	1.25.E+06	-0.704	0.29	165.00	0.65	90.00	no

Chronic Water Quality Criteria ($WQC_{Chronic}$)

Metal	K_{eq}	α	f_p	Average effluent C_f (µg/L)	Instream C_p (µg/L)	$WQC_{Chronic}$ (µg/L)	Action needed?
Arsenic	4.80.E+05	-0.729	0.00	0.00	0.00	36.00	no
Cadmium	4.00.E+06	-1.131	0.000	0.00	0.00	8.80	no
Chromium VI	3.36.E+06	-0.930	0.00	0.00	0.00	50.00	no
Copper	1.04.E+06	-0.744	0.00	0.00	0.00	3.10	no
Lead	3.10.E+05	-0.186	0.33	3.60	0.02	8.10	no
Mercury	NA	NA	NA	0.0000	0.0000	0.025	no
Nickel	4.90.E+05	-0.572	0.00	0.00	0.00	8.20	no
Selenium	NA	NA	0.998	0.00	0.00	71.00	no
Zinc	1.25.E+06	-0.704	0.29	165.00	0.65	81.00	no

Total Recoverable Effluent Limit

Metal	C_s (µg/L)	Chronic C_f (µg/L)	Chronic C_f (lbs/day)	Acute C_f (µg/L)	Acute C_f (lbs/day)
Arsenic	0.0	N/A	N/A	N/A	N/A
Cadmium	0.0	N/A	N/A	N/A	N/A
Chromium VI	0.0	N/A	N/A	N/A	N/A
Copper	0.0	N/A	N/A	N/A	N/A
Lead	0.0	N/A	N/A	N/A	N/A
Mercury	0.0	N/A	N/A	N/A	N/A
Nickel	0.0	N/A	N/A	N/A	N/A
Zinc	0.0	N/A	N/A	N/A	N/A

Water Quality Criteria (WQC)

NOTES:

*Water Quality Criteria (WQC) from State of Georgia Rules and Regulations 391-3-6-.03.

*If the calculated instream concentration is less than 50% of the instream water quality criteria, then the constinuent will be considered not to be present at levels of concern in the effluent and it will not be included in the permit.

*If the calculated instream concentration is 50% or more of the instream water quality criteria, then a permit limit for that constinuent will be placed in the permit.

End of report

Appendix C
Reasonable Potential Analysis
Outfall 003

COASTAL AND MARINE ESTUARINE

Permit Name: SNFHolding Company **NPDES Permit No.:** GA0046582 outfall 003

Stream Data:

Receiving stream Hardness:	3,022	mg/L
Upstream TSS:	10	mg/L
7Q10:	NA	ft^3/s
	#VALUE!	gal/day
1Q10:	NA	ft^3/s
	#VALUE!	gal/day

Effluent Data:

Flow	300,237	gal/day
TSS	37.50	mg/L
Instream TSS:	10.52	mg/L
Acute Dilution factor:	--	
Chronic Dilution factor:	--	

Water Quality Criteria:

Mean annual streamflow at discharge:	NA	ft^3/s
	#VALUE!	gal/day
Dilution factor:	72.750	
IWC:	1.4	%

Acute Water Quality Criteria (WQC_{Acute})

Metal	K_{eq}	α	f_p	Maximum effluent C_f (µg/L)	Instream C_p (µg/L)	WQC_{Acute} (µg/L)	Action needed?
Arsenic	4.80.E+05	-0.729	0.00	0.00	0.00	69.00	no
Cadmium	4.00.E+06	-1.131	0.000	0.00	0.00	40.00	no
Chromium VI	3.36.E+06	-0.930	0.20	12.10	0.03	1100.00	no
Copper	1.04.E+06	-0.744	0.00	0.00	0.00	4.80	no
Lead	3.10.E+05	-0.186	0.00	0.00	0.00	210.00	no
Mercury	NA	NA	NA	0.0000	0.0000	1.800	no
Nickel	4.90.E+05	-0.572	0.43	30.80	0.18	74.00	no
Selenium	NA	NA	0.998	0.00	0.00	290.000	no
Zinc	1.25.E+06	-0.704	0.28	85.50	0.33	90.00	no

Chronic Water Quality Criteria ($WQC_{Chronic}$)

Metal	K_{eq}	α	f_p	Average effluent C_f (µg/L)	Instream C_p (µg/L)	$WQC_{Chronic}$ (µg/L)	Action needed?
Arsenic	4.80.E+05	-0.729	0.00	0.00	0.00	36.00	no
Cadmium	4.00.E+06	-1.131	0.000	0.00	0.00	8.80	no
Chromium VI	3.36.E+06	-0.930	0.20	11.60	0.03	50.00	no
Copper	1.04.E+06	-0.744	0.34	1.00	0.00	3.10	no
Lead	3.10.E+05	-0.186	0.00	0.00	0.00	8.10	no
Mercury	NA	NA	NA	0.0000	0.0000	0.025	no
Nickel	4.90.E+05	-0.572	0.43	571.00	3.35	8.20	no
Selenium	NA	NA	0.998	0.00	0.00	71.00	no
Zinc	1.25.E+06	-0.704	0.28	7.00	0.03	81.00	no

Total Recoverable Effluent Limit

Metal	C_s (µg/L)	Chronic C_f (µg/L)	Chronic C_f (lbs/day)	Acute C_f (µg/L)	Acute C_f (lbs/day)
Arsenic	0.0	N/A	N/A	N/A	N/A
Cadmium	0.0	N/A	N/A	N/A	N/A
Chromium VI	0.0	N/A	N/A	N/A	N/A
Copper	0.0	N/A	N/A	N/A	N/A
Lead	0.0	N/A	N/A	N/A	N/A
Mercury	0.0	N/A	N/A	N/A	N/A
Nickel	0.0	N/A	N/A	N/A	N/A
Zinc	0.0	N/A	N/A	N/A	N/A

Water Quality Criteria (WQC)

NOTES:

*Water Quality Criteria (WQC) from State of Georgia Rules and Regulations 391-3-6-.03.

*If the calculated instream concentration is less than 50% of the instream water quality criteria, then the constinuent will be considered not to be present at levels of concern in the effluent and it will not be included in the permit.

*If the calculated instream concentration is 50% or more of the instream water quality criteria, then a permit limit for that constinuent will be placed in the permit.

End of report